

**In the Supreme Court of the United States**

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AMERICAN LEGION, *et al.*,

*Petitioners,*

v.

AMERICAN HUMANIST ASSOCIATION, *et al.*,

*Respondents.*

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MARYLAND–NATIONAL CAPITAL  
PARK AND PLANNING COMMISSION,

*Petitioner,*

v.

AMERICAN HUMANIST ASSOCIATION, *et al.*,

*Respondents.*

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**CERTIFICATE OF COMPLIANCE**

I, Richard B. Katskee, counsel for *amici curiae* on the accompanying *Brief of Religious and Civil-Rights Organizations as Amici Curiae in Support of Respondents* and a member of the Bar of this Court, certify under Rule 33.1(h) of the Rules of this Court that this brief contains 8921 words, excluding the parts of the brief that are exempted by Rule 33.1(d).



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Richard B. Katskee