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January 30, 2019

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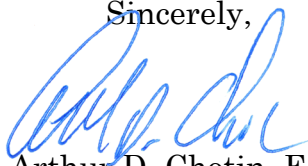
RE: NO. 17-1717: THE AMERICAN LEGION, *ET AL.* V. AMERICAN HUMANIST ASSOCIATION, *ET AL.*
NO. 18-18: MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION V. AMERICAN HUMANIST ASSOCIATION, *ET AL.*

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Freedom from Religion Foundation, Center for Inquiry, American Atheists, Inc., Military Association of Atheists & Freethinkers, and Secular Coalition of America in Support of Respondents referenced above contains **3,933** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Arthur D. Chotin, Esq.
Principal