

In the Supreme Court of the United States

THE AMERICAN LEGION, *et al.*,

Petitioners,

v.

AMERICAN HUMANIST ASSOCIATION, *et al.*,

Respondents.

MARYLAND–NATIONAL CAPITAL PARK AND PLANNING COMMISSION

Petitioners,

v.

AMERICAN HUMANIST ASSOCIATION, *et al.*,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Paul W. Hughes, counsel for *Amici* and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Brief for Historians and Legal Scholars as *Amici Curiae* Supporting Respondents contains 7,202 words, excluding the parts of the brief that are exempted by Rule 33.1(d).



Paul W. Hughes