

No. 17-1717, No. 18-18

THE AMERICAN LEGION, *et al.*,  
*Petitioners,*

v.

AMERICAN HUMANIST ASSOCIATION, *et al.*,  
*Respondents.*

and

MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION,  
*Petitioner,*

v.

AMERICAN HUMANIST ASSOCIATION, *et al.*,  
*Respondents.*

### CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, John D. Ohlendorf, a member of the Supreme Court Bar, certify that the BRIEF OF 109 UNITED STATES SENATORS AND MEMBERS OF THE UNITED STATES HOUSE OF REPRESENTATIVES AS AMICI CURIAE IN SUPPORT OF PETITIONERS in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that this brief complies with the word limitation of Supreme Court Rule 33.1(g)(x), containing 5,964 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

Date: July 26, 2018

  
John D. Ohlendorf