

IN THE
Supreme Court of the United States

TREE OF LIFE CHRISTIAN SCHOOLS,

Petitioner,

v.

CITY OF UPPER ARLINGTON, OHIO,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner contains 2,961 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

Executed on April 10, 2019.



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