

No. 19-71

In the Supreme Court of the United States

SHARONELL FULTON, *et al.*, *Petitioners*,

v.

CITY OF PHILADELPHA, *et al.*, *Respondents*.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the *Brief Christian Legal Society et al. as Amici Curiae in Support of Petitioners* contains 8,000 words exactly, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). The words were counted by Microsoft Word 2016.

I am counsel of record for amici and a member of the bar of this Court, and I declare under penalty of perjury that the foregoing statements are true and correct.

/s/ Douglas Laycock

Douglas Laycock

June 3, 2020