

**CERTIFICATE OF
COMPLIANCE**

I hereby certify that the accompanying Brief Of Amici Curiae Council For Christian Colleges And Universities, The Association For Biblical Higher Education, And Thirty-One Individual Religious Colleges And Universities Supporting Petitioners in *Fulton et al. v. Philadelphia et al.* (No. 19-123) complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 7,841 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).

/s/ Gene C. Schaerr
Gene C. Schaerr
June 3, 2020