

**CERTIFICATE OF
COMPLIANCE**

I hereby certify that the accompanying Brief Of Amicus Curiae Them Before Us Supporting Petitioner in *Box et al. v. Henderson et al.* (No. 19-1385) complies with the word count limitations of Supreme Court Rule 33.1(h) in that it contains 5,870 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted under Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 28, 2020.

/s/ Gene C. Schaerr
Gene C. Schaerr