



CERTIFICATE OF COMPLIANCE

No. 19-333

ARLENE'S FLOWERS, INC., DBA ARLENE'S FLOWERS  
AND GIFTS, *et al.*,  
*Petitioners*,

v.

WASHINGTON, *et al.*,  
*Respondents*.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* First Amendment Scholars in Support of Petitioners contains 5,932 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

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

Executed on October 15, 2019.

\_\_\_\_\_

Donna J. Wolf  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: October 15, 2019

John D. Gallagher

Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023