

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amici Curiae* of the Pacific Justice Institute, *et al.*, supporting granting the Petition in No. 20-1163, *Gloucester County School Board v. Grimm* contains 1,625 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

March 26, 2021

/s/ Frederick W. Claybrook, Jr.
FREDERICK W. CLAYBROOK, JR.
Counsel of Record
Claybrook LLC
700 Sixth St., NW, Ste. 430
Washington, D.C. 20001
(202) 250-3833
rick@claybrooklaw.com