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No. 20-261

JEFF SCHULZ, et al.,  
Petitioners,

v.

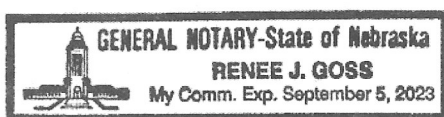
THE PRESBYTERY OF SEATTLE, et al.,  
Respondents.

### CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF FOR THE ANGLICAN CHURCH IN NORTH AMERICA AS AMICUS CURIAE IN SUPPORT OF PETITIONERS in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 5768 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 2nd day of October, 2020.

I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Renee J. Goss*  
Notary Public

*Andrew H. Cackle*  
Affiant