



**CERTIFICATE OF COMPLIANCE**

No. 21-144

SEATTLE'S UNION GOSPEL MISSION,

*Petitioner,*

v.

MATTHEW S. WOODS,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae First Liberty Institute in Support of Petitioner contains 4,004 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 September 2, 2021.

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

Date: September 2, 2021

John D. Gallagher  
Notary Public

[seal]



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