

No. 21-418

Joseph A. Kennedy,  
*Petitioner,*

v.

Bremerton School District,  
*Respondent.*

**CERTIFICATE OF COMPLIANCE WITH THE WORD LIMITATIONS**

I, Anthony G. Lantagne, hereby certify that the above referenced BRIEF OF THE RUTHERFORD INSTITUTE AS *AMICUS CURIAE* IN SUPPORT OF PETITIONER, as indicated by the word count feature of MS Word, and including footnotes but excluding those parts enumerated for exclusion under the rules, contains 2,328 words.

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

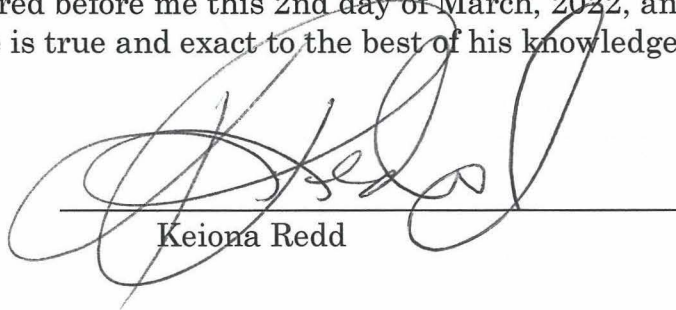
Executed on this 2nd day of March, 2022.



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COMMONWEALTH OF VIRGINIA    )  
CITY OF RICHMOND                    )    to-wit:

Anthony G. Lantagne appeared before me this 2nd day of March, 2022, and attested that the foregoing certificate is true and exact to the best of his knowledge and belief.



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