

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 20-1009

JOHN H. RAMIREZ,

*Petitioner,*

v.

BRYAN COLLIER, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I, Gordon D. Todd, certify that the Brief of Alliance Defending Freedom as *Amicus Curiae* in Support of Petitioner in the foregoing case contains 5,203 words, excluding the parts of the document 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 27, 2021.

/s/ Gordon D. Todd  
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