

No. 21-800

In the Supreme Court of the United States

TONY K. McDONALD, ET AL., *Petitioners*

v.

SYLVIA BORUNDA FIRTH, ET AL.

On Petition for a Writ of Certiorari to
the United States Court of Appeals
for the Fifth Circuit

CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying Brief of Protect the First Foundation as *Amicus Curiae* Supporting Petitioners in *McDonald v. Firth*, No. 21-800, complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 3,991 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).



Gene C. Schaerr