

No. 21-902

In the Supreme Court of the United States

DOMINIC BIANCHI, ET AL., *Petitioners*

v.

BRIAN FROSH, ATTORNEY GENERAL OF
MARYLAND, ET AL.

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

CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying Brief of the Madison Society Foundation, Inc. and the DC Project as *Amici Curiae* Supporting Petitioners in *Bianchi v. Frosh*, No. 21-902, complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 3,500 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).

/s/ Erik S. Jaffe

Erik S. Jaffe

February 14, 2022