



**CERTIFICATE OF COMPLIANCE**

No. 22-174

GERALD E. GROFF,

*Petitioner,*

v.

LOUIS DEJOY, POSTMASTER GENERAL,  
UNITED STATES POSTAL SERVICE,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Religious Liberty Scholars and Employment Law Scholars as Amici Curiae in Support of Petitioner contains 5,986 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 26, 2022.

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

Date: September 26, 2022

John D. Gallagher  
Notary Public

[seal]



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