

**CERTIFICATE OF COMPLIANCE**

No. 22-324

MICHELLE O'CONNOR-RATCLIFF AND T.J. ZANE,

*Petitioners,*

v.

CHRISTOPHER GARNIER AND KIMBERLY GARNIER,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of First Amendment Clinics, Citizens and Journalists contains 7,983 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 August 15, 2023.

/s/ Gregg P. Leslie  
Gregg P. Leslie  
*Counsel of Record*  
Zachary R. Cormier  
Arizona State University  
Sandra Day O'Connor College of Law,  
First Amendment Clinic,  
Public Interest Law Firm  
111 E. Taylor St., MC 8820  
Phoenix, AZ 85004  
Gregg.Leslie@asu.edu  
(480) 727-7398