



CERTIFICATE OF COMPLIANCE

No. 22-498

KRISTINE KURK,

Petitioner,

v.

LOS RIOS CLASSIFIED EMPLOYEES ASSOCIATION,
ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Protect the First Foundation and Manhattan Institute Supporting Petitioner contains 3,210 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio
County of Hamilton

I declare under penalty of perjury that the foregoing
is true and correct.

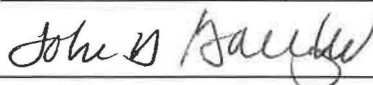
Executed on December 28, 2022.



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(800) 890-5001

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

Date: December 28, 2022



Notary Public

[seal]



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