

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amici Curiae* of the Ethics and Religious Liberty Commission of the Southern Baptist Convention, *et al.*, supporting granting the Petition in No. 23-74, *Vitagliano v. County of Westchester*, contains 2,292 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

August 24, 2023

/s/ Frederick W. Claybrook, Jr.

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