## **CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amici Curiae* of the Pacific Justice Institute, *et al.*, supporting granting the Petition in No. 24-410, *L. M. v. Town of Middleborough, MA* contains 987 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

November 12, 2024

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