

No. 25-107

In The Supreme Court of the United States

LEAH GILLIAM,
v.
DAVID GERREGANO, ET AL.

On Petition for a Writ of Certiorari to the Supreme Court of Tennessee

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Jay Alan Sekulow, a member of the Bar of this Court and an attorney for amicus curiae American Center for Law and Justice, pursuant to Rule 33.1(h), hereby certifies that the Brief Amici Curiae of the American Center for Law and Justice in Support of Petitioners complies with the pertinent word limitations. The body of the document, including footnotes (but exclusive of all material preceding page one and all material following the last word of the text of the conclusion), contains 2,828 words.

/s/ Jay Alan Sekulow
Jay Alan Sekulow

August 28, 2025