No. 25-1131

In the Supreme Court of the United States

MISSIONARIES OF SAINT JOHN THE BAPTIST, INC.,
Petitioner,

v.

JOEL FREDERIC AND ELIZABETH FREDERIC,
Respondents.

On Writ of Certiorari to the Supreme Court of Kentucky

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 Amicus Curiae of the American Center for Law and Justice in Support of Petitioner 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 5,296 words.

/s/ Jay Alan Sekulow
Jay Alan Sekulow

November 23, 2026