

CERTIFICATE OF COMPLIANCE

No. 25-125


KIM DAVIS, *Petitioner*,
v.

DAVID ERMOLD, *et al.. Respondents*.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of
Amici Curiae NATIONAL ORGANIZATION FOR MARRIAGE and THE
CLAREMONT INSTITUTE'S CENTER FOR CONSTITUTIONAL
JURISPRUDENCE in the above-referenced case, contains 2,869 words,
excluding the parts of the brief that are exempted by Supreme Court Rule
33.1(d).

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

Executed on September 8, 2025



John C. Eastman
Counsel for *Amici Curiae*