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**No. 25-581**  
In the  
**Supreme Court of the United States**

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ST. MARY CATHOLIC PARISH, LITTLETON, COLORADO, *et al.*,  
*Petitioners*,  
v.

LISA ROY, IN HER OFFICIAL CAPACITY AS EXECUTIVE DIRECTOR OF THE  
COLORADO DEPARTMENT OF EARLY CHILDHOOD, *et al.*,  
*Respondents*.

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**CERTIFICATE OF WORD COUNT**

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Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of Amicus Curiae Sutherland Institute in Support of Petitioners, which was prepared using Century Schoolbook 12-point typeface, contains 2,187 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

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

DATED this 15th day of December 2025.

Respectfully submitted,

/s/ William C. Duncan  
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