

In the Supreme Court of the United States

DANIEL GRAND,

Petitioner,

CITY OF UNIVERSITY HEIGHTS, OHIO, ET AL.,

Respondents.

On Petition for a Writ of Certiorari to the
United States Court of Appeals for the Sixth Circuit

CERTIFICATE OF COMPLIANCE

Jay Alan Sekulow, a member of the Bar of this Court and an attorney for amicus, pursuant to Rule 33.1(h), hereby certifies that the Amicus Brief of the American Center for Law and Justice in Support of Petitioner complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for footnotes, and the body of the document, including footnotes (but exclusive of all material preceding the Interest of Amicus and all material following the last word of the text of the conclusion), contains 4,425 words.

Executed on April 10, 2026

Respectfully submitted,

/s/ Jay Alan Sekulow

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