
In the Supreme Court of the United States

DANIEL GRAND, *Petitioner*,

v.

CITY OF UNIVERSITY HEIGHTS, OHIO, ET AL.

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

**BRIEF OF *AMICUS CURIAE*
PROTECT THE FIRST FOUNDATION
SUPPORTING PETITIONER**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h) I, Erik S. Jaffe, a member of the Bar of this Court, certify that the BRIEF OF *AMICUS CURIAE* PROTECT THE FIRST FOUNDATION SUPPORTING PETITIONER contains 3,934 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d) and complies with the word limitations set forth in Supreme Court Rule 33.1(g).

Dated: September 7, 2026

/s/ Erik S. Jaffe

ERIK S. JAFFE

Counsel of Record

SCHAERR | JAFFE LLP

1717 K Street NW, Suite 900

Washington, DC 20006

Telephone: (202) 787-1060

ejaffe@schaerr-jaffe.com

Counsel for Amicus Curiae