

No. 26-237

IN THE
Supreme Court of the United States

JOHN WOOLARD, ET AL.,

Petitioners,

v.

TONY THURMOND, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for *Amicus Curiae* Religious Freedom Institute in Support of Petitioners in *Woolard v. Thurmond*, No. 26-237, complies with the word limitations, as it contains 3,067 words, excluding the words exempted by Supreme Court Rule 33.1(d).

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

Date: September 23, 2026

/s/ Noel J. Francisco

Noel J. Francisco