

Supreme Court of the United States United States Courts of Appeals

1

## **CERTIFICATE OF COMPLIANCE**

No. 23-1084

JILL HILE, ET AL.,

Petitioners,

v.

## MICHIGAN, ET AL.,

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Protect the First Foundation as *Amicus Curiae* in Support of Petitioners contains 4,985 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

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

Executed on May 8, 2024.

Maa N. Maares

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Sworn to and subscribed before me by said Affiant on the date designated below.

Date: <u>May 8, 2024</u> John D Dale Un Notary Public

[seal]



JOHN D. GALLAGHER Notary Public, State of Ohio My Commission Expires February 14, 2028