

**IN THE
SUPREME COURT OF THE UNITED STATES**

JEREMY HENNING, <i>Petitioner</i> ,)	No. 23-976
v.)	
DONALD V. SNOWDEN, <i>Respondent</i> .)	On Petition for Writ of <i>Certiorari</i> to
)	the U.S. Court of Appeals for the
)	Seventh Circuit
)	

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the “Brief *Amicus Curiae* of Eagle Forum Education & Legal Defense Fund in Support of Petitioner” filed on behalf of Eagle Forum Education & Legal Defense Fund in the above-captioned matter contains 5,416 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on April 4, 2024.

/s/ Lawrence J. Joseph
Lawrence J. Joseph

1250 Connecticut Ave, NW, Suite 700-1A
Washington, DC 20036
Tel: (202) 355-9452
Email: ljoseph@larryjoseph.com

Counsel for Amicus Curiae