## IN THE

## Supreme Court of the United States

Fresno County Superintendent of Schools, Petitioner,

> v. Aileen Rizo,

> > Respondent.

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

BRIEF OF AMICUS CURIAE
SOCIETY FOR HUMAN RESOURCE
MANAGEMENT IN SUPPORT OF
PETITION FOR WRIT OF CERTIORARI

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,077 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 22, 2020.

Colin Casey Hogan

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