No. 20-1019

JADE THOMPSON,

Petitioner,

v.

 $\begin{array}{c} \mbox{Marietta Education Association, et al.,} \\ Respondents. \end{array}$ 

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief of the Cato Institute as *Amicus Curiae* in Support of Petitioner contains 5,045 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

<u>/s/ Ilya Shapiro</u> Counsel of Record