No. 20-1088

IN THE

# Supreme Court of the United States

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DAVID and AMY CARSON, as parents and next friends of O.C., and TROY and ANGELA NELSON, as parents and next friends of A.N. and R.N.,

*Petitioners*,

v.

A. PENDER MAKIN, in her official capacity as Commissioner of the Maine Department of Education,

*Respondent*.

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## CERTIFICATE OF COMPLIANCE

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I hereby certify that I am a member in good standing of the bar of this Court and that the Brief of Innovative Schools as *Amici Curiae* in Support of Petitioners contains 3,420 words and complies with the word limitation established by Rule 33.1(g)(x) of the Rule of this Court.

Dated: March 11, 2021

/s/ Allyson N. Ho
Allyson N. Ho