



## CERTIFICATE OF COMPLIANCE

No. 20-1088

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.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Council of Islamic Schools in North America, Partnership for Inner-City Education, and Union of Orthodox Jewish Congregations of America as *Amici Curiae* in Support of Petitioners contains 4,406 words, excluding the parts of the Brief 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 March 11, 2021.

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

Date: March 11, 2021

John D. Gallagher  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023