In the Supreme Court of the United States

DAVID CARSON, as parent and next friend of O.C., et al., *Petitioners*,

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

CERTIFICATE OF COMPLIANCE

I, Nicholas J. Bronni, counsel for Amici Curiae, States of Arkansas, et al., hereby certify that the Brief of Amici Curiae States of Arkansas, et al., in Support of Petitioners complies with the word limits in Rule 33.1(g), because, according to the word-processing system used to prepare the document, including footnotes but excluding the parts exempted by Rule 33.1(d), it contains 5,893 words.

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