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No. 20-1088

DAVID CARSON, as Parent and Next Friend of O. C., et al., Petitioners,

V.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF PROFESSOR MICHAEL W. MCCONNELL AS AMICUS CURIAE IN SUPPORT OF PETITIONERS in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 7337 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 8th day of September, 2021. I am duly authorized under the laws of the State of Nebraska to administer oaths.



Rence J. Loss Notary Public

Loss andrew H. Colle