IN THE SUPREME COURT OF THE UNITED STATES

No. 20-1088

DAVID CARSON, AS PARENT AND NEXT FRIEND OF O.C., ET AL., PETITIONERS

v.

A. PENDER MAKIN, RESPONDENT

CERTIFICATE OF SERVICE

I, Sarah M. Harris, counsel for amicus curiae Professor Charles L. Glenn and a member of the Bar of this Court, certify that, on September 10, 2021, the amicus brief of Professor Charles L. Glenn was sent, by third-party commercial carrier for delivery overnight and via electronic mail, to the following counsel:

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I further certify that all parties required to be served have been served.

/s/ Sarah M. Harris
Sarah M. Harris