

CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 40 bound copies and 1 unbound copy of the foregoing Brief of Amicus Curiae the Buckeye Institute in Support of Petitioners in 20-1088, David Carson, as parent and next friend of O.C., et al. v. A. Pender Makin, in her official capacity as Commissioner of the Maine Department of Education, were sent via Next Day Service to the U.S. Supreme Court, and via Next Day Service to the following parties listed below, this 10th day of September, 2021:

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All parties required to be served have been served.

I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on September 10, 2021.

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Subscribed and sworn to before me by the said Affiant on the date below designated.

Date: September 10, 2021

Joh V. Duedge

Notary Public

[seal]

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