## 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.

## CERTIFICATE OF COMPLIANCE WITH THE WORD LIMITATIONS

I, Anthony G. Lantagne, hereby certify that the above referenced BRIEF OF AMICUS CURIAE INDEPENDENT WOMEN'S LAW CENTER AND INDEPENDENT WOMEN'S FORUM IN SUPPORT OF PETITIONERS, as indicated by the word count feature of MS Word, and including footnotes but excluding those parts enumerated for exclusion under the rules, contains 4,171 words.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 10th day of September, 2021.

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COMMONWEALTH OF VIRGINIA	)	
CITY OF RICHMOND	)	to-wit:

Anthony G. Lantagne appeared before me this 10th day of September, 2021, and attested that the foregoing certificate is true and exact to the best of his knowledge and

belief.

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