## IN THE

## Supreme Court of the United States

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

Petitioners,

٧.

A. PENDER MAKIN, in her Official Capacity as Commissioner of the Maine Department of Education,

Respondent.

On Writ of Certiorari to the United States Court of Appeals for the First Circuit

## BRIEF OF AMERICAN ATHEISTS AS AMICUS CURIAE IN SUPPORT OF RESPONDENT

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,948 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on October 29, 2021.

Colin Casey Hogan

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