No. 20-1088

## IN THE Supreme Court of the United States

## DAVID CARSON, ET AL.,

Petitioners,

V.

## A. PENDER MAKIN, IN HER OFFICIAL CAPACITY AS COMMISSIONER OF THE MAINE DEPARTMENT OF EDUCATION,

Respondent.

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

## **CERTIFICATE OF COMPLIANCE**

Undersigned counsel, a member of the Bar of this Court, certifies pursuant to Supreme Court Rule 33.1(h) that the BRIEF OF NATIONAL EDUCATION ASSOCIATION, AMERICAN FEDERATION OF TEACHERS, MAINE EDUCATION ASSOCIATION, SANFORD FEDERATION OF TEACHERS, AFT LOCAL 3711, AND SERVICE EMPLOYEES INTERNATIONAL UNION AS AMICI CURIAE IN SUPPORT OF RESPONDENT complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and the brief contains 6,342 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

RAMYA RAVINDRAN (Counsel of Record) BREDHOFF & KAISER, P.L.L.C. 805 15th Street N.W. Suite 1000 Washington, DC 20005 (202) 842-2600 rravindran@bredhoff.com

Counsel for Amici Curiae

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