In the Supreme Court of the United States

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

V.

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

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FIRST CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Michelle S. Kallen, a member of the bar of this Court, certify that the accompanying Brief of Amici Curiae of Virginia, California, Delaware, Massachusetts, Minnesota, New Mexico, New York, Oregon, Washington, and the District of Columbia in Support of Defendant-Respondent contains 7,162 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on October 29, 2021.

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