In the Supreme Court of the United States

GLOUCESTER COUNTY SCHOOL BOARD, PETITIONER

v.

GAVIN GRIMM

CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying Supplemental Brief for Petitioner in *Gloucester County School Board v. Gavin Grimm*, No. 20-1163 complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 628 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).

Gene C. Schaerr