No. 20-1786

In the Supreme Court of the United States

JoANNE TROESCH, et al,

Petitioners.

v.

CHICAGO TEACHERS UNION, et al.,

Respondents.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF PACIFIC LEGAL FOUNDATION IN SUPPORT OF PETITIONERS contains 3,981 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 August 23, 2021.

DEBORAH J. LA FETRA

Counsel of Record

Pacific Legal Foundation 930 G Street

Welionah Ja Tehra

Sacramento, California 95814 Telephone: (916) 419-7111

Facsimile: (916) 419-7747 DLafetra@pacificlegal.org

Counsel for Amicus Curiae