IN THE Supreme Court of the United States

No. 20-905

INDEPENDENT SCHOOL DISTRICT No. 283, Petitioner,

v.

 $\begin{array}{c} \text{E.M.D.H.} \: \text{EX} \: \text{REL.} \: \text{L.H.} \: \text{AND} \: \text{S.D.,} \\ Respondent. \end{array}$

On Petition for a Writ of Certiorari to the U.S. Court of Appeals for the Eighth Circuit

CERTIFICATE OF COMPLIANCE

Pursuant to this Court's Rule 33.1(h), I hereby certify that the Brief of National School Boards Association, Minnesota School Boards Association, Arkansas School Boards Association, Associated School Boards of South Dakota, Iowa Association of School Boards, Missouri School Boards' Association, Nebraska Association of School Boards, North Dakota School Boards Association, National Association of Elementary School Principals, National Association of Secondary School Principals As *Amici Curiae* in Support of Petitioner contains 5,223 words, excluding parts of the document that are exempted by Rule 33.1(d).

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

Executed on January 13, 2021.

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