

**No. 20-905**

INDEPENDENT SCHOOL DISTRICT NO. 283,  
*Petitioner,*

*v.*

E.M.D.H. EX REL. L.H. AND S.D.,  
*Respondents.*

**CERTIFICATE OF COMPLIANCE**

Pursuant to Supreme Court Rule 33.1(h), I certify that the Brief of Amici Curiae AASA, The School Superintendents Association; Association of Educational Service Agencies; Arkansas Association of Educational Administrators; and Minnesota Administrators for Special Education in Support of Petitioner contains 5,004 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

February 11, 2021

*/s/ Thomas M. Bondy*  
*Counsel of Record*