No. 20-905

INDEPENDENT SCHOOL DISTRICT No. 283,

Petitioner,

 $\begin{array}{c} v. \\ {\rm E.M.D.H.~EX~REL.~L.H.~AND~S.D.}, \\ Respondents. \end{array}$

CERTIFICATE OF SERVICE

Pursuant to Supreme Court Rule 29.5(a), I certify a copy of 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 was sent via overnight FedEx to the U.S. Supreme Court and a digital copy was sent to counsel for the Petitioner and Respondents by electronic mail on February 11, 2021. The parties have consented to electronic service.

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/s/ Thomas M. Bondy Counsel of Record