## IN THE

## Supreme Court of the United States

 ${\tt INDEPENDENT\,SCHOOL\,DISTRICT\,No.\,283,}$ 

Petitioner,

v.

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

Respondent.

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

## REPLY BRIEF IN SUPPORT OF CERTIORARI

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,980 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 April 13, 2021.

Colin Casey Hogan

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