

IN THE  
**Supreme Court of the United States**

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INDEPENDENT SCHOOL DISTRICT NO. 283,  
*Petitioner,*

v.

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

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

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**SUPPLEMENTAL BRIEF FOR PETITIONER**

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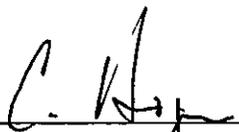
**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,979 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.

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Executed on September 3, 2021.

  
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Colin Casey Hogan  
Wilson-Epes Printing Co., Inc.