



CERTIFICATE OF COMPLIANCE

No. 21-418

JOSEPH A. KENNEDY,

Petitioner,

v.

BREMERTON SCHOOL DISTRICT,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* California School Boards Association, and its Education Legal Alliance, in Support of Respondent contains 5,240 words, excluding the parts of the Brief 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 1, 2022.

Emily Mullins
Becker Gallagher Legal Publishing, Inc.
8790 Governor's Hill Drive, Suite 102
Cincinnati, OH 45249
(800) 890-5001

Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: April 1, 2022

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, **State of Ohio**
My Commission Expires
February 14, 2023