

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

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MICHELLE MUNGER, FREDRICK COVILLO,  
APRIL HELSEL, ANN SLAGLE,

*Petitioners,*

v.

BRENDA DAVIS, FREDERICK STUFFLEBEAN,  
*Respondents.*

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

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**BRIEF OF *AMICUS CURIAE*  
MISSOURI ASSOCIATION OF COUNTIES  
IN SUPPORT OF PETITIONER**

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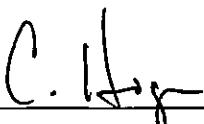
**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,067 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 December 23, 2021.

  
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