No. 21-84

FOUNDATION FOR INDIVIDUAL RIGHTS IN EDUCATION, ET AL.,

Petitioners,

v.

VICTIM RIGHTS LAW CENTER, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Charles J. Cooper a mem-

ber of the Supreme Court Bar, certify that the REPLY BRIEF FOR THE PE-

TITIONERS, in the above entitled case complies with the typeface require-

ments of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook

12 point for the text and 10 point for the footnotes, and that this brief complies

with the word limitation of Supreme Court Rule 33.1(g)(x) (2019), containing

2,980 words, excluding the parts that are exempted by Supreme Court Rule

33.1(d).

Date: November 15, 2021

/s/Charles J. Cooper

Charles J. Cooper