

IN THE SUPREME COURT OF THE UNITED STATES

No. 21-887

MIGUEL LUNA PEREZ,
Petitioner,

v.

STURGIS PUBLIC SCHOOLS, ET AL.,
Respondents.

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of Former U.S. Department of Education Officials as *Amici Curiae* in Support of Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 5,212 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 2016) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 16, 2022.



Aaron M. Panner
*Counsel of Record for Amici Curiae
Former U.S. Department of Education
Officials*