

IN THE
Supreme Court of the United States

FAIRFAX COUNTY SCHOOL BOARD,
Petitioner,

v.

JANE DOE,
Respondent.

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

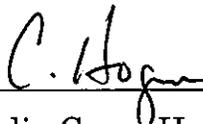
**BRIEF OF AMICI CURIAE VIRGINIA SCHOOL
BOARDS ASSOCIATION, NORTH CAROLINA
SCHOOL BOARDS ASSOCIATION, AND
SOUTH CAROLINA SCHOOL BOARDS
ASSOCIATION IN SUPPORT OF PETITIONER**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the brief contains 5,604 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.

Executed on February 7, 2022.



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