

IN THE
Supreme Court of the United States

FAIRFAX COUNTY SCHOOL BOARD,
Petitioner,

v.

JANE DOE,
Respondent.

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

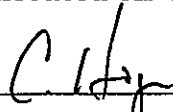
SUPPLEMENTAL BRIEF FOR PETITIONER

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,987 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 October 12, 2022.



Colin Casey Hogan
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