WAIVER

SUPREME COURT OF THE UNITED STATES

| No. 22-1009 | | | |
|---|----------------------------|-------|--------------------------------------|
| Barbara Kolkowski | | | Ashtabula Area Teachers Ass'n et al. |
| | (Petitioner) | V. | (Respondent) |
| I DO NOT INTEND TO FILE A RESPONSE to the petition for a writ of certiorari unless one is requested by the Court. | | | |
| Please check the appropriate box: | | | |
| I am filing this waiver on behalf of all respondents. | | | |
| • I only represent some respondents. I am filing this waiver on behalf of the following respondent(s): | | | |
| Ashtabula Area Teachers Association and Ohio Education Association | | | |
| Please check the appropriate box: | | | |
| I am a member of the Bar of the Supreme Court of the United States. (Filing Instructions: File a signed Waiver in the Supreme Court Electronic Filing System. The system will prompt you to enter your appearance first.) I am not presently a member of the Bar of this Court. Should a response be requested, the response will be filed by a Bar member. (Filing Instructions: Mail the original signed form to: Supreme Court, | | | |
| Attn: Clerk's Office, 1 First Street, NE, Washington, D.C. 20543). | | | |
| Signature: Scott Kronland | | | |
| Date: 4/18/23 | | | |
| (Type or print) Name Scott Kronland | | | |
| | • Mr. O Ms. | | O Mrs. O Miss |
| Firm | Altshuler Berzon LLP | | |
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A copy of this form must be sent to petitioner's counsel or to petitioner if *pro se*. Please indicate below the name(s) of the recipient(s) of a copy of this form. No additional certificate of service or cover letter is required.