No. 22-238

In the Supreme Court of the United States

CHARTER DAY SCHOOL, INC., ET AL., Petitioners,

v.

BONNIE PELTIER, AS GUARDIAN OF A.P., A MINOR CHILD, ET AL.

CERTIFICATE OF WORD COUNT

I, Kathryn E. Tarbert, a member of the Bar of this Court, hereby certify under Supreme Court Rule 33.1(h) that the Brief for Independent Women's Law Center as *Amicus Curiae* in Support of Petitioners complies with the word limitations in Supreme Court Rule 33.1(g). I further certify that the brief contains 3,614 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

/s/ Kathryn E. Tarbert
KATHRYN E. TARBERT
Counsel of Record
SCHAERR | JAFFE LLP
1717 K Street NW, Suite 900
Washington, DC 20006
(202) 787-1060
ktarbert@schaerr-jaffe.com

Counsel for Amicus Curiae

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