RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 22-238

CHARTER DAY SCHOOL, INC, ET AL.,

Petitioners.

v.

BONNIE PELTIER, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I, Gordon D. Todd, certify that the Brief of Great Hearts Academies as *Amicus Curiae* in support of Petitioners in the foregoing case contains 5,902 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 14, 2022.

/s/ Gordon D. Todd GORDON D. TODD SIDLEY AUSTIN LLP 1501 K Street, N.W. Washington, DC 20005 (202) 736-8000