IN THE

Supreme Court of the United States

MICHELLE O'CONNOR-RATCLIFF AND T.J. ZANE,

Petitioners,

v.

CHRISTOPHER GARNIER AND KIMBERLY GARNIER,

Respondents.

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

BRIEF OF AMICUS CURIAE CALIFORNIA SCHOOL BOARDS ASSOCIATION IN SUPPORT OF PETITIONERS

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 7,789 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.

Sworn to and subscribed before me this 30th day of June 2023.

MARCUS WASHINGTON NOTARY PUBLIC District of Columbia

My commission expires March 14, 2028.