

No. _____

**In The
Supreme Court of the United States**

RITA C. SIMPSON-VLACH, ET AL.,
Petitioners,

v.

MICHIGAN DEPARTMENT OF EDUCATION, ET AL.,
Respondents.

CERTIFICATE OF WORD COUNT

I hereby certify on this 9th day of November, 2023, that excluding those parts allowed by rule, the above referenced Petition for Writ of Certiorari contains 5,026 words.

Respectfully submitted,

/s/ Rory J. Bellantoni, Esq.

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