

**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 COMPLIANCE**

---

As required by Supreme Court Rule 33(1)(g), I hereby certify that Respondent Washtenaw County Intermediate School District's Brief in Opposition to Certiorari in *Simpson-Vlach, et al., v. Michigan Department of Education, et al.*, S. Ct. No. 23-507, complies with the word limitations, because it contains 6,207 words, excluding the parts of the document exempted by Rule 33(d).

I declare under penalty of perjury the foregoing is true and correct.

/s/ Timothy J. Mullins  
*Counsel for Respondent*

---