

No. 23-507
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 30th day of January, 2024, that excluding those parts allowed by rule, the above referenced Reply Brief of Petitioners contains 2,959 words.

Respectfully submitted,

/s/ Rory J. Bellantoni, Esq.
Counsel of Record
Brain Injury Rights Group, Ltd.
300 E. 95th St., #130
New York, New York 10128
(646) 850-5035
rory@pabilaw.com