

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.

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