

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

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MARK E. BROWN, PETITIONER

v.

UNIFIED SCHOOL DISTRICT, NO. 501, RESPONDENT

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ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES  
COURT OF APPEALS FOR THE TENTH CIRCUIT

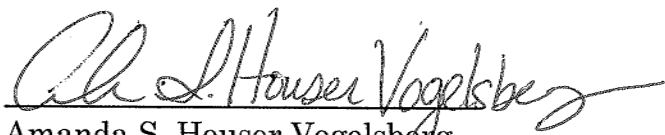
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**CERTIFICATE OF WORD COUNT**

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Pursuant to Supreme Court Rule 33.1(h), I declare that the Brief in Opposition for Respondent Unified School District No. 501 in the above referenced matter no. 24-5518, which was prepared using Century 12-point typeface, contains 4,222 words, excluding parts of the document that are exempted by Supreme Court Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word processing system (Microsoft Word) used to prepare the document.

Executed on the 11th day of November, 2024.



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