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IN THE  
**Supreme Court of the United States**

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OUR LADY OF GUADALUPE SCHOOL, *Petitioner*

v.

AGNES MORRISSEY-BERRU, *Respondent*.

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ST. JAMES SCHOOL, *Petitioner*

v.

DARRYL BIEL, AS PERSONAL REPRESENTATIVE  
OF THE ESTATE OF KRISTEN BIEL, *Respondent*.

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*On Petition for a Writ of Certiorari to the  
United States Court of Appeals  
for the Ninth Circuit*

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**CERTIFICATE OF WORD COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the *Amicus Brief* contains 3,494 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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



Executed on February 7, 2020

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