

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amici Curiae* of National Legal Foundation, *et al.*, supporting granting the Petition in No. 20-1088, *David Carson, as Parent and Next Friend of O. C., et al., v. A. Pender Makin* contains 2,427 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

March 11, 2021

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