

No. 20-1088

In the Supreme Court of the United States

DAVID AND AMY CARSON, AS PARENTS AND
NEXT FRIENDS OF O.C., AND TROY AND ANGELA NELSON,
AS PARENTS AND NEXT FRIENDS OF A.N. AND R.N.,

Petitioners,

v.

A. PENDER MAKIN, IN HER OFFICIAL CAPACITY AS
COMMISSIONER OF THE MAINE DEPARTMENT OF
EDUCATION,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of the Liberty Justice Center and American Federation for Children contains 3,854 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 March 11, 2021

/s/ Daniel R. Suhr

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