

No. 20-1088

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

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**DAVID AND AMY CARSON, AS PARENTS AND NEXT FRIENDS OF O.C., ET AL.,**  
*Petitioners,*

**v.**

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

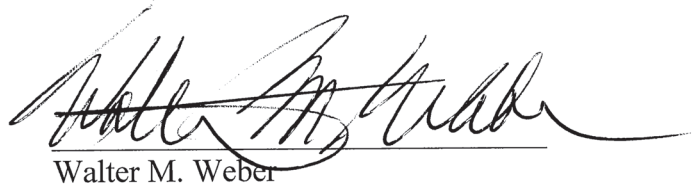
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On Writ of Certiorari to the  
United States Court of Appeals for the First Circuit

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**CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS**

Walter M. Weber, a member of the Bar of this Court and an attorney for amicus, pursuant to Rule 33.1(h), hereby certifies that the Amicus Brief of The American Center for Law and Justice in Support of Petitioners complies with the pertinent word limitations. The body of the document, including footnotes (but exclusive of all material preceding the Interest of Amicus and all material following the last word of the text of the conclusion), contains 2862 words.

  
Walter M. Weber

Sept. 8, 2021