

No. 20-1088

In the Supreme Court of the United States

DAVID AND AMY CARSON, ET AL.,

Petitioners,

v.

A. PENDER MAKIN,

,

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, American Federation for Children, and Atlantic Legal Foundation contains 4,757 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 September 9, 2021

/s/ Daniel R. Suhr

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