

IN THE SUPREME COURT OF THE UNITED STATES

No. 20-1088

DAVID CARSON, AS PARENT AND
NEXT FRIEND OF O.C., ET AL., PETITIONERS

v.

A. PENDER MAKIN, RESPONDENT

CERTIFICATE OF WORD COUNT

I, Sarah M. Harris, counsel for amicus curiae Professor Charles L. Glenn and a member of the Bar of this Court, certify that the amicus brief of Professor Charles L. Glenn in the above-captioned case contains 7,341 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Sarah M. Harris

Sarah M. Harris

September 10, 2021