

No. 20-1088

---

IN THE  
**Supreme Court of the United States**

DAVID CARSON, ET AL,

*Petitioners,*

v.

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

*Respondent.*

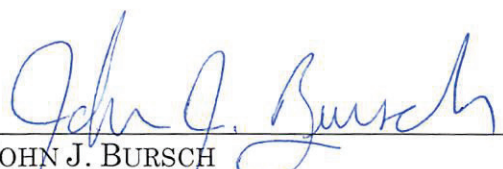
---

**CERTIFICATE OF COMPLIANCE**

---

As required by Supreme Court Rule 33.1(h), I certify that the Brief of The Jewish Coalition of Religious Liberty as *Amicus Curiae* contains 6,305 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

Executed on September 9, 2021.

  
\_\_\_\_\_  
JOHN J. BURSCH  
ALLIANCE DEFENDING FREEDOM  
440 First Street NW  
Suite 600  
Washington, DC 20001  
(616) 450-4235  
jbursch@ADFlegal.org