

CERTIFICATE OF COMPLIANCE

No. 20-1088

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

v.

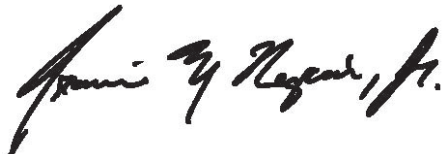
A. PENDER MAKIN,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of National School Boards Association, et. al., as *Amici Curiae* in Support of Respondents contains 6613 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 October 28, 2021.



Francisco M. Negrón, Jr.