

2311 Douglas Street  
Omaha, Nebraska 68102-1214

1-800-225-6964  
(402) 342-2831  
Fax: (402) 342-4850



E-Mail Address:  
contact@cocklelegalbriefs.com

Web Site  
www.cocklelegalbriefs.com

No. 20-1088

DAVID AND AMY CARSON, AS PARENTS AND NEXT  
FRIENDS OF O.C., AND TROY AND ANGELA NELSON,  
AS PARENTS AND NEXT FRIENDS OF A.N. AND R.N.,  
Petitioners,

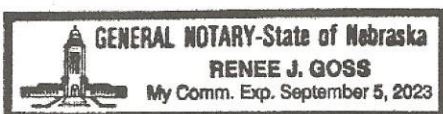
v.

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 FREEDOM FROM RELIGION FOUNDATION AND CENTER FOR INQUIRY AS AMICI CURIAE IN SUPPORT OF RESPONDENT in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 4555 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 29th day of October, 2021.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Renee J. Goss*  
\_\_\_\_\_  
Notary Public

*Andrew H. Cockle*  
\_\_\_\_\_  
Affiant