

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

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DAVID AND AMY CARSON, AS PARENT AND  
NEXT FRIENDS OF O.C., ET AL.,

*Petitioners,*

v.

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

*Respondent.*

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*On Writ of Certiorari to the  
United States Court of Appeals for  
the First Circuit*

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**BRIEF OF AMICI CURIAE THE MAINE SCHOOL  
MANAGEMENT ASSOCIATION, MAINE SCHOOL  
BOARDS ASSOCIATION, AND MAINE SCHOOL  
SUPERINTENDENTS ASSOCIATION  
IN SUPPORT OF RESPONDENT (AFFIRMANCE)**

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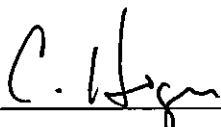
**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,337 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.

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Executed on October 29, 2021.

  
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Colin Casey Hogan  
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