

No. 21-968

IN THE
Supreme Court of the United States

FAIRFAX COUNTY SCHOOL BOARD,

Petitioner,

v.

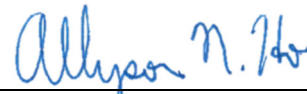
JANE DOE,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Brief of Independent Women's Law Center as *Amicus Curiae* in Support of Petitioner contains 2,542 words and complies with the word limitation established by Rule 33.1(g)(x) of the Rules of this Court.

Dated: February 7, 2022



Allyson N. Ho