IN THE

Supreme Court of the United States

THE STATE OF WEST VIRGINIA, et al.,

Petitioners.

v.

B.P.J., BY NEXT OF FRIEND AND MOTHER, HEATHER JACKSON,

Respondent.

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

BRIEF OF THE ORGANIZATION OF AMERICAN HISTORIANS, THE LGBTQ+ HISTORY ASSOCIATION, AND HISTORIAN SCHOLARS AS AMICI CURIAE IN SUPPORT OF RESPONDENT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 6,588 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.

Sworn to and subscribed before me this 17th day of November 2025.

AZA SALANDER DONNER

NOTARY PUBLIC

District of Columbia

My commission expires April 30, 2029.