

No. 25-1189

In the Supreme Court of the United States

ROCKLIN UNIFIED SCHOOL DISTRICT,
Petitioner,

v.

PUBLIC EMPLOYMENT RELATIONS BOARD; ROCKLIN
TEACHERS PROFESSIONAL ASSOCIATION,
Respondents.

*On Petition for Writ of Certiorari to the
Court of Appeal of California,
Third Appellate District*

**CERTIFICATE OF COMPLIANCE
WITH WORD LIMITATIONS**

As required by Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of the Manhattan Institute as *Amicus Curiae* Supporting Petitioner contains 3,430 words, excluding the parts of the brief that are exempted by Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

May 15, 2026

/s/ Ilya Shapiro
Ilya Shapiro
Counsel of Record