

In the
Supreme Court of the United States

ROCKLIN UNIFIED SCHOOL DISTRICT,

Petitioner,

v.

PUBLIC EMPLOYMENT RELATIONS BOARD; ROCKLIN
TEACHERS PROFESSIONAL ASSOCIATION,

Respondents.

CERTIFICATE OF WORD COUNT

I, Luke N. Berg, counsel for Amicus Curiae Dr. Erica E. Anderson and a member of the Bar of this Court, certify that the Brief of Amicus Curiae Dr. Erica Anderson in Support of Petitioner in the above-captioned case contains 3,615 words, excluding the parts that are exempted by Rule 33.1(d).

Dated: May 18, 2026.

/s/ Luke N. Berg

Luke N. Berg