Supreme Court of the United States

JOSEPH MILLER; EZRA WENGERD; JONAS SMUCKER; DYGERT ROAD SCHOOL; PLEASANT VIEW SCHOOL; SHADY LANE SCHOOL,

Petitioners.

v.

JAMES V. MCDONALD, ET AL.,

Respondents.

ON PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF ALABAMA AND 20 OTHER STATES AS *AMICI CURIAE* IN SUPPORT OF PETITIONERS contains 5,260 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on September 2, 2025.

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