

No. 25-759

In the Supreme Court of the United States

AMBER LAVIGNE,

Petitioner,

v.

GREAT SALT BAY COMMUNITY SCHOOL BOARD,

Respondent.

*On Petition for a Writ of Certiorari to the
United States Court of Appeals for the First Circuit*

**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 4,469 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.

/s/ Ilya Shapiro

Ilya Shapiro

Counsel of Record

February 23, 2026