NO. 25-906

IN THE

Supreme Court of the United States

E. D., A MINOR, BY HER PARENT AND NEXT FRIEND, LISA DUELL, ET AL.,

Petitioners,

v.

NOBLESVILLE SCHOOL DISTRICT, ET AL.

Respondents.

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

AMICUS CURIAE BRIEF OF NC VALUES INSTITUTE IN SUPPORT OF PETITIONERS

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INTEREST OF *AMICUS CURIAE*[1]

Amicus curiae respectfully urges this Court to grant the Petition and reverse the Seventh Circuit ruling.

NC Values Institute, formerly known as the Institute for Faith and Family, is a North Carolina nonprofit corporation that works in various arenas of public policy to protect faith, family, and freedom. See https://ncvi.org.

INTRODUCTION AND SUMMARY OF THE ARGUMENT

Noblesville School District has created a program allowing students to form extracurricular student-interest clubs, initiated and led by the students themselves with minimal faculty involvement. A group of Noblesville High School students, led by Petitioner E.D., launched the Noblesville Students for Life ("NSFL") to raise awareness and engage in activities that would help spread the group's pro-life message. When NSFL commenced, the School "had no formal written policy governing the content of flyers for student interest clubs." *E.D. v. Noblesville Sch. Dist.*, 151 F.4th 907, 911 (7th Cir. 2025). But "in practice" school officials expected the flyers "to

[1] Counsel of record for all parties received notice at least 10 days prior to the due date of *amicus curiae*'s intention to file this brief. *Amicus curiae* certifies that no counsel for a party authored this brief in whole or in part and no person or entity, other than *amicus*, its members, or its counsel, has made a monetary contribution to its preparation or submission.

exclude any 'disruptive' or 'political' content." *Id.* at 912. NSFL's flyers displayed "images of young protestors holding signs reading 'Defund Planned Parenthood.'" *Id.* at 911. Administrators objected to this "political image" (*id.* at 912), fearing the message might be erroneously attributed to the School, which "was already walking 'on eggshells'" (*id.* at 912-913).

There is no school-sponsored curricular activity or other government speech involved in this case, but only the private speech of students who voluntarily participate in NSFL, an extracurricular, student-led club. The School's censorship violates the free speech rights of these students. But the Seventh Circuit upholds the suppression, relying on the outdated "reasonable observer" analysis derived from the long-criticized, now-defunct test from *Lemon v. Kurzman*, 403 U.S. 602 (1971).

ARGUMENT

I. THE CONSTITUTIONALITY OF THE SCHOOL'S RESTRICTION SHOULD NOT BE DRIVEN BY SPECULATION ABOUT THE REACTION OF AN IMAGINARY OBSERVER.

It is neither reasonable nor even likely that observers would erroneously attribute the words on NSFL's flyer – specifically, on the *photograph* shown on the flyer – to the School. But the Seventh Circuit concluded that onlookers "might reasonably perceive [the picture] to bear the imprimatur of the school." *E.D.*, 151 F.4th at 915 quoting *Hazelwood Sch. Dist. v. Kuhlmeier*, 484 U.S. 260, 271 (1988).

A. The speech at issue is *private* student speech protected by the First Amendment—not *government* speech.

The Seventh Circuit ruling reveals a glaring inconsistency. The court affirms the School's censorship of *student* speech spoken by a "*student* interest club" that is by definition "*student*-initiated" and "*student*-led" with minimal faculty involvement "to supervise the use of school facilities and provide logistical support." *E.D.*, 151 F.4th at 911 (emphasis added). The court does an end-run around this inconsistency by speculating about the response of an imaginary, hypothetical, presumably "reasonable" observer.

The First Amendment protects private individuals, not the government. In Establishment Clause cases, this Court has stressed the element of private choice, "holding time and time again that when a neutral government policy or program *merely allows or enables* private religious acts, those acts do not necessarily bear the state's imprimatur." *Rubin v. City of Lancaster*, 710 F.3d 1087, 1099 (9th Cir. 2013) (emphasis added). The same principle applies here. The speech of a student-initiated group does not bear the School's imprimatur merely because the School policy "allows or enables" the group to speak. Just as "[t]here is a crucial difference between *government* speech endorsing religion" and "*private* speech endorsing religion," there is a "crucial difference" between government and private speech more generally. *Capitol Square Review and Advisory Bd. v. Pinette,* 515 U.S. 753, 765 (1995), citing *Bd. of Educ. of Westside Cmty. Sch. v. Mergens,* 496 U.S. 226, 250

(1990) (emphasis added). The Free Speech Clause does not protect government censorship.

Matter of public concern. Speech on matters of public concern merits heightened constitutional protection. The student speech here centers on a matter of contentious public debate. There has hardly ever been a more divisive matter of public concern than abortion, "a controversial [and] sensitive political topic[] . . . of profound value and concern to the public." *Janus v. AFSCME, Council 31*, 585 U.S. 878, 914 (2018) (cleaned up). Such speech "occupies the highest rung of the hierarchy of First Amendment values." *Snyder v. Phelps*, 562 U.S. 443, 452 (2011). Every person has a right to speak on this matter. The Noblesville Students for Life (NSFL) exists to educate other students about abortion and promote pro-life events. *E.D.*, 151 F.4th at 911. The School asserts a "pedagogical goal of maintaining neutrality on matters of political controversy." *Id.* at 917. Its censorship of NSFL's flyer is anything but neutral.

Masking censorship. Recasting the *student-led* group's flyer as "school sponsored" *government* speech easily masks censorship and potential viewpoint discrimination, notwithstanding "the school's central role in facilitating the flyers' placement on its walls." *Id.* at 915. There is a heightened risk of censorship or mixed messages when private speech occurs in a context involving the government, including public education. The government may be subject to the First Amendment even if – although literally "speaking" – it infringes on private expression. *Shurtleff v. City of Boston*, 596 U.S. 243, 269 (2022) (Alito, Gorsuch, Thomas, J.J., concurring in the judgment). As these

concurring Justices warned in *Shurtleff*, “courts must be very careful when a government claims that speech by one or more *private* speakers is actually *government* speech.” *Id.* at 262 (2022) (emphasis added). The government speech doctrine becomes “susceptible to dangerous misuse.” *Ibid.*, citing *Matal v. Tam*, 582 U.S. 218, 235 (2017). The government speech doctrine must be restrained to prevent the power and machinery of a government-run public school from being used to stifle private student expression. That is precisely what occurred here.

B. No *reasonable* observer would attribute the flyer’s content to the school.

Officials feared that NSFL’s pro-life viewpoint might be mistakenly attributed to the School: “Flyers promoting a polarizing political slogan (Defund Planned Parenthood) and bearing an administrator's initials alongside school-sponsored postings could mislead observers into thinking the school endorses that view.” *E.D.*, 151 F.4th at 917. But "[t]he proposition that schools do not endorse everything they fail to censor is not complicated." *Kennedy v. Bremerton Sch. Dist.* (*Kennedy IV*), 4 F.4th 910, 941 (9th Cir. 2021) (O’Scannlain, J., dissenting from denial of rehearing en banc), quoting *Mergens*, 496 U.S. at 250. Even “secondary school students” themselves are “mature enough” and “likely to understand” that the school “does not endorse or support student speech that it merely permits . . . .” *Ibid.* If students can understand this principle, public school officials and federal judges should, too.

The court's flawed reasoning relies on the "reasonable observer," an integral aspect of the endorsement test that stems from the purpose and effect prongs of the now-discredited *Lemon* test. *Lemon* was "an ahistorical, atextual, and failed attempt to define Establishment Clause violations." *Kennedy IV*, 4 F.4th at 945 (Nelson, J., dissenting from denial of rehearing en banc). This Court "long ago abandoned *Lemon* and its endorsement test offshoot." *Kennedy v. Bremerton Sch. Dist.*, 597 U.S. 507, 534-535 (2022); *see also Town of Greece v. Galloway*, 572 U.S. 565, 576-577 (2014) (declining an invitation to use *Lemon* test); *Am. Legion v. Am. Humanist Assn*, 588 U.S. 29, 84 (2019) (describing *Lemon* as a "misadventure"); *Shurtleff,* 596 U.S. at 283 (Gorsuch, Thomas, J.J., concurring) ("Recognizing *Lemon*'s flaws, this Court has not applied its test for nearly two decades."). This Court "no longer applies the old test articulated in *Lemon*." *Am. Legion*, 588 U.S. at 84 (Kavanaugh, J., concurring). A majority of this Court's Justices have "personally driven pencils through the creature's heart." *Lamb's Chapel v. Ctr. Moriches Union Free Sch. Dist.*, 508 U.S. 384, 398 (1993) (Scalia, J., concurring in the judgment). A multitude of exceptions have finally swallowed the *Lemon* rule. But many courts, including the Seventh Circuit panel, failed to get the memo.

Petitioners' case is not about the Establishment Clause, but *Lemon*'s endorsement test has been imported into its analysis of student speech in a public school. The Seventh Circuit emphasized the placement of the flyers "alongside official school-sponsored communications in high-traffic common

areas throughout the school" and concluded that "a reasonable observer could easily conclude that the flyers reflected the school's endorsement." *E.D.*, 151 F.4th at 916. But *who* are those observers? Most would be students or faculty, presumably aware of their school's student-interest groups and related policies. The club meetings occurred "during school hours, on school property, and under the supervision of a faculty advisor." *Ibid*. The court noted these factors to support its conclusion, yet that is exactly why observers would be school "insiders" familiar with the student-driven nature of the clubs—not passerby members of the public lacking that knowledge.

The now-defunct endorsement test is not the proper analytic avenue for this case. Like the *Lemon* test from which it derives, it is a failed modern experiment. In the Establishment Clause context, this highly subjective test requires fine tuning to apply and has spawned lawsuits over trivial offenses, based on an imaginary "reasonable" observer's disapproval. But the test is qualified — a *reasonable* observer is presumed to be well informed. That observer is not—or at least should not be—"*any* person who could find an endorsement of religion" or "*some* reasonable person" who *might* be offended or "*might* think the State endorses religion." *Pinette,* 515 U.S. at 780 (O'Connor, J., concurring) (internal quotation marks omitted). In Establishment Clause cases, the "reasonable observer" looks through the lens of "history and ubiquity." *County of Allegheny v. ACLU*, 492 U.S. 573, 630 (1989) (O'Connor, concurring). The consequences would be overwhelming if the test were

read to encompass even the slightest offense and thus allow a "heckler's veto" to rule the outcome. *Elk Grove Unified Sch. Dist. v. Newdow,* 542 U.S. 1, 35 (2004) (O'Connor, J., concurring), citing *Pinette,* 515 U.S. at 780 ("There is always *someone* who, with a particular quantum of knowledge, reasonably might perceive a particular action as an endorsement of religion.").

C. The School's restriction should not be affirmed based on an observer's *erroneous* perception.

It is troubling whenever an observer's erroneous perception of government action leads to a violation of individual liberty. An Establishment Clause violation should not hinge on "an observer's potentially mistaken belief that the government has violated the Constitution, rather than on whether the government has *in fact* done so." *Utah Highway Patrol Ass'n v. Am. Atheists, Inc.*, 565 U.S. 994, 1004 n. 7 (2011) (Thomas, J., dissenting from denial of certiorari). The focus on "perception" or "endorsement" easily morphs into the phantom constitutional violations that arose in cases like *Santa Fe*, *Shurtleff*, and others. These imaginary concerns do not "justify actual violations of an individual's First Amendment rights." *Bremerton*, 597 U.S. at 543. In *Bremerton*, the School District reverted to an "objective observer" analysis "because someone *might* mistakenly attribute Kennedy's prayer to the District." *Kennedy IV*, 4 F.4th at 941 (O'Scannlain, J., dissenting from denial of rehearing en banc). The Ninth Circuit reasoned that "an objective student observer" would see Kennedy "perform a distinctively Christian religious act on a secured portion of school

property while supervising students"—"something no ordinary citizen could do." *Kennedy v. Bremerton Sch. Dist*. (*Kennedy I*), 869 F.3d 813, 836 (9th Cir. 2017) (Smith, J., specially concurring). After this Court remanded the case, the Ninth Circuit doubled down and manufactured a "mandate" to silence Kennedy, based on the possible *misperception* of endorsement. *See Kennedy v. Bremerton Sch. Dist*. (*Kennedy III*), 991 F.3d 1004, 1016-19 (9th Cir. 2021); *Kennedy IV*, 4 F.4th at 929 (Christen, J., concurring in denial of rehearing en banc) ("Had BSD abandoned its opposition to Coach Kennedy's on-field prayers after his multiple interviews with local and national media, an objective observer would have perceived that BSD endorsed his speech.")

A similar principle applies here. An observer *might* mistakenly attribute the flyer's content to the School. Based on that potential misunderstanding, the Seventh Circuit allowed the School to censor student speech protected by the First Amendment. But it is patently unreasonable to attribute the flyer's content to the School. The flyer contains a *picture* of students holding signs. Those signs have words that express a viewpoint. The School had zero involvement in designing the flyer apart from its efforts at suppression. Only by ignoring that censorship could anyone think (though mistakenly) that the School itself endorsed the message displayed on the picture. The mere possibility of mistaken attribution does not convert private speech into government endorsement.

Three current Justices of this Court have warned against the focus on public perception, because it "encourages courts to categorize private expression as

government speech in circumstances in which the public is liable to misattribute that speech to the government," thus "allow[ing] governments to exploit public expectations to mask censorship." *Shurtleff*, 596 at 265-266 (Alito, Gorsuch, Thomas, J.J., concurring in the judgment). Only a few years after *Lemon*, "[f]our dissenting Justices" of this Court "disputed that endorsement could be the proper test" because it condemns many time-honored practices that date back to the founding. *Town of Greece*, 572 U.S. at 579-580, citing *Allegheny,* 492 U.S. at 670-671 (Kennedy, J., concurring in the judgment in part and dissenting in part).

Misunderstanding persists, as demonstrated by cases over the years. School officials in *Santa Fe Ind. Sch. Dist. v. Doe,* denied students the right to voluntarily pray, fearing the *perception* of government approval. 530 U.S. 290, 308-309 (2000). Not only the *Santa Fe* ruling itself but "the tone of the Court's opinion . . . bristles with hostility to all things religious in public life." *Id.* at 318 (Rehnquist, J., dissenting). That hostility arose from an irrational fear that some unknown observer *might* believe the school endorsed the students' prayers. Boston officials in *Shurtleff* were convinced the Constitution prohibited them from allowing private parties to "fly a religious flag on public property." 596 U.S. at 273-274. The City admitted to denying Shurtleff's request "because it believed flying a religious flag at City Hall could violate the Establishment Clause." *Id.* at 258. In *Bremerton*, the School District "issued an ultimatum" against "any overt actions" that might even *appear* to endorse Coach Kennedy's prayer (597 U.S. at 517-518), allowing his prayers only at a "private location"

(*id*. at 519) and reasoning that his suspension "was essential to avoid a violation of the Establishment Clause" (*id*. at 532). This Court rejected that paranoid approach to the First Amendment.

These recurring misunderstandings are unnecessary now that *Bremerton* has demonstrated how much "our Establishment Clause jurisprudence ha[s] gone off the rails." 597 U.S. at 540. The School District asserted that it not only "*may* prohibit" its employees' private prayers "but that it *must* do so in order to conform to the Constitution." *Ibid*. Officials contended they had a "duty to ferret out and suppress religious observances." *Id*. at 543-544. But this Court found "no historically sound understanding" of the Establishment Clause that would require that hostile approach. *Id*. at 541. On the contrary, "[t]he Constitution neither mandates nor tolerates that kind of discrimination." *Id*. at 544.

D. This Court should eschew the "*offended* observer" analysis that has crept in to replace the "*reasonable* observer" test.

Lemon created a monster, wielding the Establishment Clause as a "reverse Free Exercise Clause" weapon to protect offended observers from exposure to religion. Patrick M. Garry, *The Supreme Court Corrects a Seventy-Five-Year Distortion in Establishment Clause Jurisprudence*, 56 Ind. L. Rev. 95, 118 (2022). *Lemon*'s monster has escaped from its cage, attacking First Amendment rights in other contexts, including the student speech in this case.

The "offended observer" theory is even further off base constitutionally than the "reasonable observer." As Justice Gorsuch emphasized in *Am. Legion*, this "theory of standing has no basis in law," as it fails to articulate a "concrete and particularized" injury. 588 U.S. at 80 (Gorsuch, J., concurring). The mere presence of a disagreement, "however sharp and acrimonious it may be, is insufficient by itself to meet Art. III's requirements." *Id.*, quoting *Diamond v. Charles*, 476 U.S. 54, 62 (1986).

The malleable imaginary observer is easily manipulated to reach desired results. The combination of "offended" and "reasonable" observers is lethal. In Establishment Clause cases it leads to blatant hostility to all things religious in the public square—a result never contemplated by the Constitution's Framers. In other contexts, like this case, it breeds unrestrained censorship. This chaotic jurisprudence jeopardizes liberty. In some cases, courts dare to ground their conclusion on what a poorly defined observer might mistakenly think. That approach should be jettisoned and replaced with a return to reality.

II. THE RESTRICTION HAS NO VALID EDUCATIONAL PURPOSE.

In *Hazelwood*, this Court held that educators may exercise "editorial control over the style and content of student speech in school-sponsored expressive activities," provided their conduct is "reasonably related to legitimate pedagogical concerns." 484 U.S. at 273. *Hazelwood* allowed school officials to regulate

what was essentially "the school's own speech, that is, articles that appear[ed] in a publication that is an official school organ." *Morse v. Frederick*, 551 U.S. 393, 423 (2007) (Alito, J., concurring). In *Hazelwood,* a "high school newspaper [was] produced as part of the school's journalism curriculum" (484 U.S. at 262), a "supervised learning experience for journalism students" (*id*. at 270). Similarly, in *Bethel School District No. 403 v. Fraser*, "[t]he assembly was part of a *school-sponsored* educational program in self-government." 478 U.S. 675, 677 (1986) (emphasis added). These cases clearly implicate classroom activity that was part of the curriculum, in contrast to the extra-curricular student-led, student-interest groups at issue in this Petition.

This Court concluded in *Hazelwood* that "[i]t is only when the decision to censor a . . . vehicle of student expression has *no valid educational purpose* that judicial intervention is required to protect student rights." *Hazelwood*, 484 U.S. at 273 (emphasis added). Noblesville's student-driven clubs are not part of the school curriculum. Their purpose, the Seventh Circuit explains, "is to facilitate *extracurricular* opportunities that are entirely *student*-led and *student*-run," thus "foster[ing] *student* initiative" and directing school resources "toward *student*-driven activities." *E.D.*, 151 F.4th at 919 (emphasis added). The School's censorship serves "no valid educational purpose" but tends to defeat these stated goals instead of serving them. Judicial intervention is needed to protect the rights of the students.

A. The restriction undercuts respect for the beliefs of others—a fundamental civic virtue that public schools can and should cultivate.

Public education plays a critical role in preparing young minds to exercise their own constitutional rights and respect the rights of others. Rigorous protection of constitutional liberties is essential to preparing young people for citizenship, so that we do not "strangle the free mind at its source and teach youth to discount important principles of our government as mere platitudes." *W. Va. State Bd. of Educ. v. Barnette*, 319 U.S. 624, 637 (1943). "The vigilant protection of constitutional freedoms is nowhere more vital than in the community of American schools." *Shelton v. Tucker*, 364 U.S. 479, 487 (1960).

This principle is nowhere more evident than in the legal battles over religious expression in public schools. As students learn how to implement First Amendment principles, respect for others includes "maintaining respect for the religious observances of others," "a fundamental civic virtue that government (including the public schools) can and should cultivate." *Lee v. Weisman,* 505 U.S. 577, 638 (1992) (Scalia, J., dissenting). "At the core of the First Amendment's right to free speech is the right of one student to express a religious viewpoint to another student without fear." *Morgan v. Swanson*, 659 F.3d 359, 396 (6th Cir. 2011) (Elrod, J., dissenting) (distribution of "candy cane pens" by elementary schoolchildren to their classmates at holiday party). An absolute ban on references to religion

misrepresents American history, truncates the education provided to students, and "corrodes the civic virtues that *underlie* the First Amendment." *Kennedy IV*, 4 F.4th at 936 (O'Scannlain, J., dissenting from denial of rehearing en banc).

This case is not explicitly about religious speech, although the pro-life movement implicates core religious convictions about the sanctity of human life. But the First Amendment broadly facilitates the free flow of information and ideas. "The Nation's future depends upon leaders trained through wide exposure" to a "robust exchange of ideas" that "discovers truth out of a multitude of tongues" rather than "authoritative selection." *Keyishian v. Board of Regents*, 385 U.S. 589, 603 (1967). The government may not "contract the spectrum of available knowledge." *Bd. of Educ., Island Trees Union Free Sch. Dist. v. Pico*, 457 U.S. 853, 866 (1982), quoting *Griswold v. Connecticut*, 381 U.S. 479, 482 (1965). This is particularly true in education, where students are exposed to a broad range of subjects. Public schools are not "enclaves of totalitarianism" and "students may not be regarded as closed-circuit recipients of only that which the State chooses to communicate." *Pico*, 457 U.S. at 877 (Blackmun, J., concurring), quoting *Tinker v. Des Moines Indep. Cmty. Sch. Dist.*, 393 U.S. 503, 511 (1969).

As one Ninth Circuit judge acknowledged in the *Bremerton* proceedings, schools should "teach [students] about the first amendment, about the difference between private and public action, [and] about why we tolerate divergent views." *Kennedy I*, 869 F.3d at 837 n. 5 (Smith, J., concurring). Schools

can best accomplish that task by declining to censor the private speech of students in an explicitly student-driven extracurricular club.

B. Public school students must learn to tolerate diverse viewpoints.

The School asserts a "pedagogical duty to create a stable, neutral educational environment." *E.D.*, 151 F.4th at 917. But as Petitioners correctly argue, suppression of core political speech shuts down "the very kind of robust debate secondary schools should encourage." *Ibid*. Schools prepare students to live in a free society, where no one can escape offense:

> [T]he Constitution does not guarantee citizens a right entirely to avoid ideas with which they disagree. It would betray its own principles if it did; no robust democracy insulates its citizens from views that they might find novel or even inflammatory.

Elk Grove v. Newdow, 542 U.S. at 44 (O'Connor, J., concurring). Even in public schools, the "prohibition of a particular expression of opinion" demands "more than a mere desire to avoid the discomfort and unpleasantness that always accompany an unpopular viewpoint." *Mahanoy Area School District v. B.L.* 594 U.S. 180, 193 (2021), quoting *Tinker*, 393 U.S. at 509. The "proudest boast" of American "free speech jurisprudence" is its protection for "the freedom to express 'the thought we hate.'" *Matal v. Tam*, 582 U.S. at 246, quoting *United States v. Schwimmer*, 279 U.S. 644, 655 (1929) (Holmes, J., dissenting). Exposure to unwelcome ideas is the price of preserving American

freedoms. Americans must "develop thicker skin." David E. Bernstein, *Defending the First Amendment From Antidiscrimination*, 82 N.C. L. Rev. 223, 245 (2003). The School's allegedly "neutral" atmosphere, coupled with its blatant censorship on a matter of urgent public concern, creates an unacceptable risk of viewpoint discrimination.

"America's public schools are the nurseries of democracy," where the free exchange of ideas "must include the protection of unpopular ideas," ensuring that students understand "the well-known aphorism, 'I disapprove of what you say, but I will defend to the death your right to say it.'" *Mahanoy,* 594 U.S. at 190. The extracurricular student-interest groups can contribute to the free exchange of ideas, but only if the School does not censor student speech. Rigorous protection of constitutional liberties prepares young persons for citizenship, so as not to "strangle the free mind at its source and teach youth to discount important principles of our government as mere platitudes." *Barnette*, 319 U.S. at 637. The First Amendment will not tolerate "laws that cast a pall of orthodoxy over the classroom." *Keyishian* , 385 U.S. at 603.

It is a "critical part of a [teacher's] job" to "affirm[] the equal dignity of every student," so as to create an optimal learning environment. Erica Goldberg, *"Good Orthodoxy" and the Legacy of Barnette*, 13 FIU L. Rev. 639, 666 (2019). But "students need to tolerate views that upset them, or even disturb them to their core, especially from other students, and perhaps even from professors." *Ibid*. Students must learn to endure speech that is offensive or even false as "part of

learning how to live in a pluralistic society, a society which insists upon open discourse towards the end of a tolerant citizenry." *Lee v. Weisman*, 505 U.S. at 590. Students attending public school are exposed to "ideas they find distasteful or immoral or absurd or all of these." *Id.* at 591. Students participating in NSFL must be able to disseminate their pro-life views and interact freely with others in the public school system.

CONCLUSION

This Court should grant the Petition and reverse the Seventh Circuit ruling.

Respectfully submitted,

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