

SUPREME COURT OF THE UNITED STATES

No. 26-193

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BETHANY M. HALL,

Petitioner,

v.

A. SCOTT FLEMING, DIRECTOR, VIRGINIA STATE COUNSEL OF HIGHER
EDUCATION,

Respondent.

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CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,899 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 14th day of September, 2026.

Julie Connor

Julie Connor

Sworn to and subscribed before me
on this 14th day of September, 2026.

Mariana Braylovsky

MARIANA BRAYLOVSKIY

Notary Public State of New York

No. 01BR6004935

Qualified in Richmond County

Commission Expires March 30, 2030