

IN THE
Supreme Court of the United States

ARIELLA HELLMAN, ET AL.,
Petitioners,

v.

KATHERINE CRAVEN, ET AL.,
Respondents.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Timothy S. Durst, a member of the bar of this Court, hereby certify, on this 20th day of August, 2026, that the Brief of Council for American Private Education and Agudath Israel of America as *Amici Curiae* in Support of Petitioners in the above-captioned case contains 5,765 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Timothy S. Durst

Timothy S. Durst