

No. 23-1280

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**In the Supreme Court of the United States**

PARENTS PROTECTING OUR CHILDREN, UA,  
*Petitioner,*

*v.*

EAU CLAIRE AREA SCHOOL DISTRICT, WISCONSIN,  
ET AL.,  
*Respondents.*

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**CERTIFICATE OF COMPLIANCE WITH WORD  
LIMITATIONS**

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As required by Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of The Manhattan Institute and Dr. Leor Sapir as *Amicus Curiae* Supporting Petitioner contains 5,996 words, excluding the parts of the brief 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 July 8, 2024.

/s/ Ilya Shapiro  
Ilya Shapiro  
*Counsel of Record*