No. 24-297

IN THE

Supreme Court of the United States

TAMER MAHMOUD, ET AL.,

Petitioners,

v.

THOMAS W. TAYLOR, ET AL.,

Respondents.

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

BRIEF OF MONTGOMERY COUNTY FAITH LEADERS AS *AMICI CURIAE* IN SUPPORT OF RESPONDENTS

MEAGHAN VERGOW
Counsel of Record
JOSHUA REVESZ
O'MELVENY & MYERS LLP
1625 Eye Street NW
Washington, D.C. 20006
(202) 383-5300
mvergow@omm.com

LAUREN MARTIN
O'MELVENY & MYERS LLP
1301 Avenue of the
Americas, 17th Floor
New York, NY 10019

Attorneys for Amici Curiae

TABLE OF CONTENTS

Page

INTEREST OF *AMICI CURIAE* 1

SUMMARY OF ARGUMENT.................................. 1

ARGUMENT 3

I. PUBLIC EDUCATION ENABLES AMERICANS TO PARTICIPATE IN PLURALISTIC SOCIETY. 3

II. A CONSTITUTIONALLY COMPELLED OPT-OUT SYSTEM WOULD UNDERMINE THE FIRST AMENDMENT AND PUBLIC EDUCATION ALIKE. 8

A. Mandatory opt-outs would contract public-school curricula and stymie lessons about faith. 9

B. Mandatory opt-outs would turn schools into ideological battlegrounds. 12

C. If petitioners prevail, damages liability will be an even greater threat to classroom discussion. 13

CONCLUSION 17

APPENDIX A: List of *Amici Curiae* 1a

TABLE OF AUTHORITIES

Page(s)

Cases

Brown v. Board of Education,
347 U.S. 483 (1954) 2, 5

Carson ex rel. O.C. v. Makin,
596 U.S. 767 (2022) 8

Citizens United v. FEC,
558 U.S. 310 (2010) 11

Edwards v. Aguillard,
482 U.S. 578 (1987) 10, 11

Emp. Div., Dept. of Human Resources of Ore. v. Smith,
494 U.S. 872 (1990) 3, 4

Epperson v. Arkansas,
393 U.S. 97 (1968) 10

Good News Club v. Milford Cent. Sch.,
533 U.S. 98 (2001) 9

Illinois ex rel. McCollum v. Bd. of Educ. of Sch. Dist. No. 71,
333 U.S. 203 (1948) 5, 11

Janus v. Am. Fed'n of State, Cnty., & Mun. Emps., Council 31,
585 U.S. 878 (2018) 13

Kennedy v. Bremerton Sch. Dist.,
597 U.S. 507 (2022) 2-4, 7-9, 16

Lee v. Weisman,
505 U.S. 577 (1992) 3

TABLE OF AUTHORITIES
(cont'd)

Page(s)

McCreary Cnty. v. ACLU of Ky.,
545 U.S. 844 (2005) 3

Meyer v. Nebraska,
262 U.S. 390 (1923) 15

N.Y. Times Co. v. Sullivan,
376 U.S. 254 (1964) 4

Plyler v. Doe,
457 U.S. 202 (1982) 4

Safford United Sch. Dist. No. 1 v. Redding,
557 U.S. 364 (2009) 15

Saline Parents v. Garland,
88 F.4th 298 (D.C. Cir. 2023) 12

Tinker v. Des Moines Indep. Cmty. Sch. Dist.,
393 U.S. 503 (1969) 6

Town of Greece v. Galloway,
572 U.S. 565 (2014) 7

W. Va. Bd. of Educ. v. Barnette,
319 U.S. 624 (1943) 7

Zorach v. Clauson,
343 U.S. 306 (1952) 4

Statutes

42 U.S.C. § 1983 14

Other Authorities

The Federalist No. 48 (J. Madison) 4

INTEREST OF *AMICI CURIAE*[1]

Amici are faith leaders who live in Montgomery County and lead congregations in the county and nearby communities. Although *amici* come from different faith traditions, they are united in their call for a society that is inclusive and welcoming to all. *Amici* are also parents, who send their children to Montgomery County Public Schools precisely to ensure that they are exposed to a full range of perspectives.

Amici therefore have an acute interest in the question presented. *Amici* believe that the constitutional interpretation petitioners ask this Court to recognize would, if accepted, hinder *amici*'s faith practices, weaken public education, and run contrary to the pluralistic values on which the First Amendment's Free Exercise Clause rests.

Amici's names and professional affiliations are set forth in the Appendix. *Amici* submit this brief in their individual capacities.

SUMMARY OF ARGUMENT

The First Amendment guarantees that our Nation can be home to people of all religions and no religion. Unlike in other societies, no one is forced to hide their faith. Instead, the First Amendment's Free Exercise Clause, Free Speech Clause, and Establishment Clause operate together to ensure that matters of

---

[1] No counsel for any party has authored this brief in whole or in part, and no person other than *amici* or their counsel have made any monetary contribution intended to fund the preparation or submission of this brief.

faith can be openly discussed, and that all Americans can choose for themselves what they believe.

Those constitutional values are reflected in our public schools. In the Court's finest hour, it held that "education is the very foundation of good citizenship" because it serves as the "principal instrument in awakening the child to cultural values . . . and in helping him to adjust normally to his environment." *Brown v. Board of Education*, 347 U.S. 483, 493 (1954). And just three years ago, this Court reiterated that commitment, holding that "learning how to live in a pluralistic society" is "a trait of character essential to a tolerant citizenry," and a mission supported by our public schools. *Kennedy v. Bremerton Sch. Dist.*, 597 U.S. 507, 538 (2022) (internal quotation marks omitted).

This case puts those foundational values under threat. Petitioners seek to wield the First Amendment to curtail students' exposure to ideas in the classroom. Indeed, petitioners' arguments would restrict students' access to *facts* about the world in which we live. The First Amendment is about facilitating dialogue, not preventing it. And adopting petitioners' rule would threaten public schools' ability to carry out their educational functions: it would require schools to shrink their curricula; it would allow parents to turn schools into forums for ideological disputes; and it would even expose teachers to damages liability if they make classroom comments that a parent later wishes their child had not heard.

Amici urge this Court not to misinterpret the Free Exercise Clause to weaken public schools. *Amici*'s faith traditions espouse inclusivity and tolerance, and

petitioners' vision for public schools runs counter to their own religious practice. But if schools are prohibited from informing students about the wide range of beliefs and identities in the United States, all Americans will suffer. If we cannot learn about each other, we cannot learn how to function in society as it actually exists. That result would turn the First Amendment's commitment to tolerance on its head.

ARGUMENT

I. PUBLIC EDUCATION ENABLES AMERICANS TO PARTICIPATE IN PLURALISTIC SOCIETY.

This Court recently emphasized that "learning how to tolerate speech or prayer of all kinds is part of learning how to live in a pluralistic society, a trait of character essential to a tolerant citizenry." *Kennedy*, 597 U.S. at 538 (quoting *Lee v. Weisman*, 505 U.S. 577, 590 (1992)). The United States, after all, is a place for "adherents of all religions, as well as those who believe in no religion at all." *McCreary Cnty. v. ACLU of Ky.*, 545 U.S. 844, 884 (2005) (O'Connor, J., concurring). Tolerance begins with knowledge. When we learn about each other, we often find that we have more in common than we feared. And where there are differences, we learn how to bridge them, or to chart a path forward despite them.

Three clauses of the First Amendment work in tandem to safeguard our pluralistic society. The Free Exercise Clause ensures that Americans can "live out their faiths" in public. *Kennedy*, 597 U.S. at 524 (citing *Emp. Div., Dept. of Human Resources of Ore. v. Smith*, 494 U.S. 872, 877 (1990)). The Free Speech

Clause "provides overlapping protection for expressive religious activities," *id.* at 523, by protecting Americans' right to "uninhibited, robust, and wide-open" debate on all matters of public concern, including matters of faith, *N.Y. Times Co. v. Sullivan*, 376 U.S. 254, 270 (1964). And the Establishment Clause safeguards the right to practice or forebear from practicing religion free from government "coercion." *Kennedy*, 597 U.S. at 537; *see, e.g.*, *Zorach v. Clauson*, 343 U.S. 306, 314 (1952). Together, these provisions "counsel mutual respect and tolerance, not censorship and suppression, for religious and nonreligious views alike." *Kennedy*, 597 U.S. at 514.

The First Amendment's "parchment barriers," though, accomplish little unless the values they reflect can be put into practice. The Federalist No. 48, at 333 (J. Madison). If Americans do not come in contact with ideas and beliefs that were previously unknown to them, they will never develop the "mutual respect and tolerance" that the Constitution aims to foster. *Kennedy*, 597 U.S. at 514.

Public schools are a unique place—likely the best possible site—for these exchanges. This Court has "recognized the public schools as a most vital civic institution for the preservation of a democratic system of government, and as the primary vehicle for transmitting the values on which our society rests." *Plyler v. Doe*, 457 U.S. 202, 221 (1982) (citations and internal quotation marks omitted). Indeed, the *Brown* Court wrote that "education is perhaps the most important function of state and local governments," in part because it "is the very foundation of good

citizenship" and "the principal instrument in awakening the child to cultural values." *Brown*, 347 U.S. at 493.

That is because, at school, students are exposed to *difference*. "The modern public school derived from a philosophy of freedom reflected in the First Amendment." *Illinois ex rel. McCollum v. Bd. of Educ. of Sch. Dist. No. 71*, 333 U.S. 203, 214 (1948) (opinion of Frankfurter, J.). Schools are the primary place where young people learn about identities and ideas outside of their own personal experiences. Students of all races and religions attend the same school. School is where many Americans are likely to meet fellow students who wear kippot, forgo meat for Lent, or pray to Mecca during the school day. And school is where many students will first make friends who are gay, lesbian, bisexual, and transgender. All of this exposure combats prejudice: collective learning in shared classrooms with people of all religions, races, political backgrounds, genders, and sexualities is a surefire way to build tolerance of those different identities.

No surprise, then, that public school curricula reflect the pluralistic nature of the public school environment. Coexistence, cooperation, and civil discourse in society require mutual understanding. So schools will often—should often—teach about the differences that students observe. That can mean instructing on the panoply of world faiths: "One can hardly respect a system of education that would leave the student wholly ignorant of the currents of religious thought that move the world society for a part in which he is being prepared." *McCollum*, 333 U.S. at 236 (Jackson, J., concurring). It can also mean

explaining to students why classmates talk differently, look differently, or act differently from one another. Obscuring these differences would not serve the goals of public education, or of the First Amendment itself: "[O]ur history says that it is this sort of hazardous freedom—this kind of openness—that is the basis of our national strength and of the independence and vigor of Americans who grow up and live in this relatively permissive, often disputatious, society." *Tinker v. Des Moines Indep. Cmty. Sch. Dist.*, 393 U.S. 503, 508-09 (1969).

For *amici*, exploring differences is not just a civic nicety: it is integral to the practice of their faith. *Amici* are religious leaders from different traditions. But they are unified in their conviction that understanding and respect for others are essential to building an inclusive and welcoming society, a conviction grounded in their respective faith traditions and reflective of their shared commitment to human dignity and flourishing. That is partly why *amici* have chosen to live in Montgomery County, the most religiously diverse county in the United States. *See* Pet'rs' Br. 6. It is why *amici* are committed to promoting interfaith dialogue and understanding. And it is why *amici* have chosen to send their children to Montgomery County Public Schools in the hope and expectation that through public education they will be exposed to diverse viewpoints and lived experiences. *Amici* have a personal stake—in addition to an ethical, social, moral, and political interest—in making sure that public schools, in Montgomery County and elsewhere, teach the full gamut of the American

experience. In other words, scrubbing curricula of all diversity would impair *amici*'s religious practices.

None of that, of course, is a license for coercion. "If there is any fixed star in our constitutional constellation, it is that no official, high or petty, can prescribe what shall be orthodox in politics, nationalism, religion, or other matters of opinion or force citizens to confess by word or act their faith therein." *W. Va. Bd. of Educ. v. Barnette*, 319 U.S. 624, 642 (1943). As practitioners of many faiths—some of which have been subject to state persecution throughout history—*amici* are adamant that schools must teach understanding, not mandate belief.

Thus, schools can introduce the range of faith traditions but cannot instruct that one religion is true. They can teach students about current events, but must not instruct that any politician or ideology has a monopoly on what is right or true. They can teach about gender and sexuality, but must tell students that they can choose how to act authentically to themselves while respecting the dignity of others. *Cf.* Pet. App. 640 ("No child who does not agree with or understand another student's gender, expression, or their sexual identity is asked to change how they feel about it.").

No doubt "some will take offense" to those lessons, however they are phrased. *Kennedy*, 597 U.S. at 538-39. But "offense" alone "does not equate to coercion." *Id.* at 539 (quoting *Town of Greece v. Galloway*, 572 U.S. 565, 589 (2014) (alterations adopted)). As long as schools are merely exposing children to the ideas shared by their fellow citizens, the school is advancing

the values of the First Amendment, not contravening them.

II. A CONSTITUTIONALLY COMPELLED OPT-OUT SYSTEM WOULD UNDERMINE THE FIRST AMENDMENT AND PUBLIC EDUCATION ALIKE.

This case is a direct challenge to the pluralistic values that the First Amendment embodies and that public education safeguards. Petitioners ask this Court to recognize a constitutional right for parents to absent their children from lessons that they do not want their children to hear. And they insist that such a right should inhere regardless of whether the lessons are coercive or merely expose students to many perspectives. Pet'rs' Br. 43-46; *see* U.S. Br. 26-29.

Accepting those arguments would have far-reaching consequences, all at the cost of building a "tolerant citizenry." *Kennedy*, 597 U.S. at 538. Of course, no parent is obligated to send their child to public school. *Cf. Carson ex rel. O.C. v. Makin*, 596 U.S. 767, 776 (2022). So if opt-outs had no effect beyond the objecting parents and their children, *amici* would have no quarrel with petitioners' claims.

But a ruling in petitioners' favor will not be so limited: instead, a constitutional opt-out doctrine would worsen public education in multiple ways. Given the costs of opt-outs, schools would hesitate before including important topics in their curricula. Parents of all perspectives could manipulate this newly recognized right to pressure schools. And given the threat of personal liability, teachers would hesitate before beginning the kinds of organic discussions that make

education worthwhile. These ramifications would be immediate, long-lasting, and impossible to address at the local level.

A. Mandatory opt-outs would contract public-school curricula and stymie lessons about faith.

A central flaw in petitioners' argument is the claim that constitutionally mandated opt-outs would be costless to schools and the diverse communities they serve.

In fact, there is every reason to think that constitutionally compelled opt-outs will substantially complicate public education. As the record in this action shows, opt-outs are disruptive, especially for younger students for whom alternative activities must be found. *See* Pet. App. 96-99, 606-08. Allowing older students to opt out of topics of study raises questions about how to assess all students equally. And opt-outs can make students feel excluded: Students whose parents opt them out of topics may experience social pressure or reprisal, and students who identify with the material that prompted the opt-out may feel hurt and isolated.

The obvious result, therefore, will be that schools will shape their curricula to minimize opt-outs. If particular material would prompt a flood of opt-outs, that material will be removed from lesson plans. The consequence will be that all children will learn less, and that opting-out parents will acquire a "heckler's veto" over public school curricula—precisely what the First Amendment abhors. *Kennedy*, 597 U.S. at 534

(quoting *Good News Club v. Milford Cent. Sch.*, 533 U.S. 98, 119 (2001)).

Amici believe that public schools should cover the ethical, historical, political, or scientific questions that are critical to a well-rounded education. Students should learn about the world around them, including about the identities and values of people of all religions, races, genders, and sexualities. Losing discussion of those topics would make it harder for students to learn to coexist in a multicultural, multifaith society.

Take, for one example, the teaching of world faiths. As religious leaders whose congregations sit in a diverse community, *amici* believe that it benefits all Americans to understand fellow citizens' religious beliefs. Many schools agree, teaching the tenets and histories of Abrahamic and non-Abrahamic religions. Yet if parents begin to opt their children out of lessons on faiths that are not their own—contending, as petitioners do here, that mere exposure to those beliefs interferes with their ability to instruct their children in their own faith—those lessons will become far rarer. Students will be less likely to learn about the horrors of the Holocaust, the teachings of Confucius, or the history of the Reformation. And children who do not learn about other faiths will become adults who are less likely to understand and respect the pluralistic society they inhabit and that *amici* value.

Or take the teaching of evolution, a subject familiar to this Court's Establishment Clause jurisprudence. This Court has held that schools cannot require teachers to teach creation science alongside evolution. *See Edwards v. Aguillard*, 482 U.S. 578, 596-

97 (1987); *Epperson v. Arkansas*, 393 U.S. 97, 109 (1968). But a required opt-out regime could effectively unwind those precedents. That is because if enough students opt out of science lessons, school districts may very well change those lessons—both to avoid absenteeism and because science (unlike sex education) is a subject on which students are tested, and so schools will want all students to learn the same topics. Siding with petitioners here would thus "undermine[] the provision of a comprehensive scientific education." *Edwards*, 482 U.S. at 587. The same problems may redound in the study of literature, history, and other subjects.

None of this is to say that parents should never be able to opt their students out of instruction. As petitioners themselves note, different states and localities have adopted different policies that address circumstances when opt-outs should be permitted. *See* Pet'rs' Br. 7-8. And decisionmakers at that level can tailor policies to balance the potential risks of opt-out regimes with parents' legitimate interests in furthering their children's education.

But a rule of constitutional law is a "sledge hammer rather than a scalpel." *Citizens United v. FEC*, 558 U.S. 310, 399 (2010) (Stevens, J., concurring in the judgment). "We must leave some flexibility to meet local conditions, some chance to progress by trial and error." *McCollum*, 333 U.S. at 237 (Jackson, J., concurring). But adopting petitioners' rule in this case would take these decisions out of educators' control. There would be no way to tailor opt-out regimes to harmonize various interests, or to make a course

correction if opt-outs (as *amici* predict and fear) upend public school curricula.

B. Mandatory opt-outs would turn schools into ideological battlegrounds.

A mandatory opt-out regime could also have adverse consequences beyond the curriculum, politicizing the public school environment and creating discord within school communities.

Americans are moving further apart. And public schools are not immune to this phenomenon. *See Saline Parents v. Garland*, 88 F.4th 298, 300 (D.C. Cir. 2023) (discussing controversy over Attorney General memorandum "expressing concern over a spike in reported incidents involving harassment, intimidation, and threats of violence against school administrators, board members, teachers, and staff").

Constitutionalizing opt-outs would fan these flames. Parents who disagree with specific lessons could use the holding of this case to pull their children from class, and to urge their fellow community members to do the same.[2] Parents on the other side of the ideological dispute, meanwhile, will respond in kind. Petitions will fly to get enough parents to effectively veto various topics through opt-outs.

[2] To be sure, the Free Exercise Clause would at most protect parents' religious, not political, desire to opt their children out. But that line can be blurry, and schools—especially given the threat of damages litigation, *see infra* Section II.C—will not realistically be positioned to police the religious sincerity of any asserted belief.

Nothing good lies at the end of this road. Students will be hurt when their classmates absent themselves from discussions relevant to their identities or viewpoints. In some places, parents of faith will feel the sincerity of their beliefs called into question if they (perhaps because they, like *amici*, hold pluralistic values) choose not to opt their children out of lessons. In other places, the parents and students opting out might face ostracism as a result of their decision. The bottom line will be that school communities will become more fraught and less tolerant of differences. "The First Amendment was meant for better things." *Janus v. Am. Fed'n of State, Cnty., & Mun. Emps., Council 31*, 585 U.S. 878, 956 (2018) (Kagan, J., dissenting).

C. If petitioners prevail, damages liability will be an even greater threat to classroom discussion.

The worst consequences of petitioners' rule, though, may come outside of the opt-out context. Not all classroom conversations are pre-scripted in careful lesson plans. And not all lessons are confined just to pre-vetted curricular materials, like the books at issue in this case. Instead, some of the best instruction arises organically, in response to students' questions or comments.

But if petitioners persuade the Court that the Free Exercise Clause provides "notice and opt-out rights" for potentially controversial instruction, *see* Pet'rs' Br. 19, organic conversations in classrooms will become legally risky. A teacher who speaks off-script could give an answer that her students' parents do not want their children to hear. And if she does so, she and her

employer could be liable for *damages* for having violated the parents' free-exercise rights by denying them notice and the chance to opt out of the supposedly controversial instruction. *See* 42 U.S.C. § 1983. Petitioners' rule, therefore, would require every public-school teacher in the country to consider, before making any in-class statement, whether that statement could subject the teacher to suit.

Consider just a few dilemmas that petitioners' rule would create:

- A student raises his hand during a science lesson and asks how old the Earth is. Can his teacher answer the question without stopping class and checking whether any parent objects to the potential answer?
- An English teacher is asked about John Donne's sonnet titled "Batter my heart, three-person'd God." May the teacher explain Donne's reference to the Trinity without assuring herself that every parent is comfortable with the precise explanation she plans to give?
- A student comes into school one day and asks to be called by different pronouns. Can the teacher convey that request to the class, or is the teacher liable for damages if he does so and a parent later objects to the discussion?

This is no way to run an educational environment. Teaching our young people is an honorable but difficult and frequently thankless calling. Teachers should be able to focus their efforts on instructing their students—not on worrying about financial liability under Section 1983. And while qualified

immunity may, for a time, dispose of some suits against teachers who make comments that parents later dislike, *see, e.g.*, *Safford United Sch. Dist. No. 1 v. Redding*, 557 U.S. 364, 377 (2009) (applying the qualified immunity test in the school official context), it will not resolve them all. In particular, if a parent flags in advance that she or he does not want a child to learn about a particular topic on religious grounds, petitioners' rule would seem to require the teacher to recognize the potential issue in real time, halt conversation, and usher a student out of the room.

So the result, again, will be to chill speech. Teachers who fear suits will shut down conversations rather than give impromptu answers. School districts (which themselves may bear liability for teachers' off-the-cuff remarks) will direct that classroom environments be arranged to minimize litigation, not to maximize education. The school environment will become more sterile, with organic conversations harder to find. Students, in short, will learn less.

All of this is at odds with the First Amendment's commitment to open discourse, including about matters of faith. *See supra* at 3-5. The Court's prior decisions in this area have facilitated, not diminished, the free flow of ideas in classrooms. Indeed, a decision on which petitioners chiefly rely, *Meyer v. Nebraska*, 262 U.S. 390 (1923), applied the First Amendment to save teachers from the threat of suits arising out of their instruction. *Id.* at 403; *see, e.g.*, Pet'rs' Br. 23-26. It would be ironic if petitioners could harness that precedent to stifle organic conversations and subject hardworking teachers to federal suits.

* * *

The heart of the First Amendment is that we should hear and respect the views of others. Because "[r]espect for religious expression is indispensable to life in a free and diverse Republic," that principle is strongest when it comes to matters of faith. *Kennedy*, 597 U.S. at 543-44. So the Court should not subvert the First Amendment's commitment to free discourse by adopting petitioners' rule. That rule whitewashes the existence of difference across our pluralistic society. It will have severely adverse effects on schools' ability to prepare students to be citizens of the United States. It will inflame ideological battles over public schooling. And it will cow teachers from even responding to inquiries.

This all will be to the detriment of *amici*, whose religious practices are bound up in recognizing the very differences that petitioners' rule will shunt aside. It will also be to the detriment of public school teachers and students, and to all Americans of all faiths. The Court should protect the First Amendment's values by rejecting petitioners' First Amendment claim.

CONCLUSION

This Court should affirm the judgment below.

Respectfully submitted,

MEAGHAN VERGOW
Counsel of Record
JOSHUA REVESZ
O'MELVENY & MYERS LLP
1625 Eye Street, NW
Washington, D.C. 20006
(202) 383-5300
mvergow@omm.com

LAUREN MARTIN
O'MELVENY & MYERS LLP
1301 Avenue of the
Americas, 17th Floor
New York, NY 10019

April 9, 2025

APPENDIX

TABLE OF CONTENTS

Page

APPENDIX A: List of *Amici Curiae* 1a

APPENDIX A
LIST OF *AMICI CURIAE*[1]

The Reverend Sari Ateek, Rector, St. John's Episcopal Church Norwood Parish, Chevy Chase, MD

Reverend Daniel Cho, Pastor, Silver Spring United Methodist Church, Silver Spring, MD

Rabbi Deborah Bodin Cohen, Rabbi, Congregation Beth Chai, Bethesda, MD

Reverend Rachel Cornwell, Pastor, Dumbarton United Methodist Church, Washington, DC

Reverend Sara Fisher, Pastor, University Christian Church, Hyattsville, MD

Reverend Joey Heath-Mason, Pastor, St. Paul's United Methodist Church, Kensington, MD

The Reverend Kent Marcoux, Priest, Episcopal Diocese of Washington, Washington, DC

Reverend James McSavaney, Pastor, United Methodist Church, Howard Chapel-Ridgeville, Mount Airy, MD

---

[1] Institutional affiliations are provided for identification purposes only. The views expressed in this brief do not reflect the views of the institutions with which *amici* are affiliated.

Reverend Amanda Poppei, Senior Minister, Unitarian Universalist Church of Arlington, Arlington, VA

Rabbi Adam Rosenwasser, Senior Rabbi, Temple Emanuel, Kensington, MD

Reverend Dr. Rebekah A. Savage, Minister, Unitarian Universalist Congregation of Rockville, Rockville, MD

Reverend Christian Schmidt, Community Minister, Unitarian Universalist Society of Mill Creek, Newark, DE

Rabbi Sid Schwarz, Founding Rabbi, Adat Shalom Reconstructionist Congregation, Bethesda, MD

Reverend Angela M. Wells, Pastor, Christ United Methodist Church, Columbia, MD

Mr. Dennis Williams, Director of Christian Education, Bethesda United Methodist Church, Bethesda, MD