ORIGINAL

IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

DR. VALERIE RITTER, *for herself as an individual and for and on behalf of her Minor Children* RR *and* ER;
KIMBERLY BUTLER, *for herself as an individual and for and on behalf of her Minor Child* HB;
MARY ANN MARTIN, *for herself as an individual and for and on behalf of her Minor Children KM, EM, and MM*;
DR. BRITNEY ELSE, *for herself as an individual and for and on behalf of her Minor Child BJ*; and
THE OKLAHOMA STATE MEDICAL ASSOCIATION, *an Oklahoma Not for Profit Corporation*,
Plaintiffs/Appellees,

v.

THE STATE OF OKLAHOMA; and
THE HONORABLE KEVIN STITT, *in his official capacity as* GOVERNOR OF THE STATE OF OKLAHOMA,
Defendants/Appellants,

No: 119,840

District Court No: CV-2021-1918
Judge: Mai

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The Legislature has plenary authority over public schools that it lacks over private schools, and it treats them differently as a result. In four of the five claims at issue, the district court properly followed this Court's precedent in rejecting arguments to limit that plenary authority over public schools. Nevertheless, the district court erred when it addressed the question of the Legislature's authority over private schools, essentially holding that the state is obligated to equally regulate public and private schools. The Legislature must protect parental choice to a greater degree in public schools than in private schools because parents who send their children to private schools make a choice to do so, but parents in public schools often lack a similar freedom of choice—and the entire purpose of the challenged law is to expand parent and student choice. This Court should hold that the Legislature can rationally treat private schools differently than public schools, and it should reverse the injunction.

STATEMENT OF THE ISSUES

(1) Whether a state law regarding masks in public K-12 schools violates the equal protection component of the Oklahoma Constitution's due process clause by not affecting private K-12 schools.[1]

(2) Whether the State of Oklahoma is immune from this suit.

BACKGROUND

In May of this year, the Legislature passed and the Governor signed SB 658, which in relevant part limits the authority of public schools in the state to impose mask mandates. Section 2(A)(3), codified at 70 O.S. § 1210.189(A)(3), instructs that public schools cannot implement a mask mandate that discriminates against students who have not been vaccinated against COVID-19. Section (3)(A), codified at 70 O.S. § 1210.190(A), instructs that public schools

[1] This brief is referring to K-12 schools when it uses the general terms "public schools" and "private schools."

cannot implement a mask mandate unless the Governor declares an emergency in their jurisdiction and they consult with their local health department. It also imposes several requirements on the mask mandate: that it "explicitly list the purposes," details the "specific masks or medical devices" that comply with the mandate, and is reconsidered "at each regularly scheduled board meeting." *Id.*

Plaintiffs sought a temporary injunction. They raised five arguments against the law. *First*, and most relevant to this appeal, they argued that the mask provisions of the two statutes violate the equal protection component of the Oklahoma Constitution's Due Process Clause because they do not apply to private K-12 schools. *Second*, they argued that the mask provisions are a special law in violation of Article 5, § 46 of the Oklahoma Constitution. *Third*, they argued that SB 658 as a whole does not encompass a single subject. *Fourth*, they argued that the mask provisions fail rational basis review under Oklahoma's due process clause. *Fifth*, they argued that the Oklahoma Constitution creates a fundamental right to education and that the mask provisions violate that right.

The district court found that only one of Plaintiffs' claims was likely to succeed. The district court recognized this Court's repeated admonitions to lower courts that the Legislature and not a court determines policies related to education. *See* Tr. at 22-23 (quoting *Sch. Dist. No. 25 of Woods Cnty. v. Hodge*, 1947 OK 220, ¶ 2). It rejected the due process and right-to-education arguments about whether masks are effective or not effective in schools as a question committed to the Legislature in its policymaking process. *See id.* The district court then reviewed SB 658 in its entirety and concluded that all of its provisions related to one subject, "health and safety of the children while they are in school." Tr. at 24. It rejected the single subject arguments on that basis. *See id.* Finally, the district court observed that it "did not see a rational basis that is tied to a compelling government interest in leaving out the private school[s] versus the public schools." Tr.

at 26. Thus, it found an equal protection violation was likely to succeed because private schools were "included in [§ 1210.]191 to start with" but not included in these two new statutes. Tr. at 27.[2]

In balancing the equitable factors to craft an injunction, the district court observed that "parental choice is extremely important to the Legislature." Tr. at 26. It also noted that the concern for equal protection should not override a public policy choice regarding education that "is very obvious to the Court." *Id.* Thus, the court concluded that it was in the public interest to enjoin Appellants from enforcing the mask provisions of the two statutes against any school district that respected the Legislature's policy regarding parental choice in health and safety, as expressed in provisions applied to both public and private schools in §§ 1210.192-193—namely, enjoining the prohibition on mask mandates only if the mandate allows for exemptions on medical, religious, or personal grounds.

ARGUMENT

When reviewing a temporary injunction, this Court looks at whether a plaintiff established by clear and convincing evidence that four elements weigh in his favor: "1) the likelihood of success on the merits; 2) irreparable harm to the party seeking injunction relief if the injunction is denied; 3) his threatened injury outweighs the injury the opposing party will suffer under the injunction; and 4) the injunction is in the public interest." *Dowell v. Pletcher*, 2013 OK 50, ¶ 7.

"[A] heavy burden is cast on those challenging a legislative enactment to show its unconstitutionality." *Thomas v. Henry*, 2011 OK 53, ¶ 8. "If there is any doubt as to the Legislature's power to act in any given situation, the doubt should be resolved in favor of the validity of the action taken by the Legislature." *Draper v. State*, 1980 OK 117, ¶ 10. A law will be deemed

[2] In finding success was only likely on equal protection, the district court did not explicitly comment on the special law challenge, which was foreclosed by this Court's precedent. *See Fair Sch. Fin. Council*, 1987 OK 114, ¶ 64 (no special law claim where there is "no allegation" that the challenged law "do[es] not apply to all districts in the state").

unconstitutional only if it "is clearly, palpably, and plainly inconsistent with the Constitution." *Lafalier v. Lead-Impacted Cmtys. Relocation Assistance Trust*, 2010 OK 48, ¶ 15. Courts "do[] not consider the 'propriety, desirability or wisdom' in a statute." *Burns v. Cline*, 2016 OK 99, ¶ 3 (quoting *Douglas v. Cox Ret. Props., Inc.*, 2013 OK 37, ¶ 3). Their function "is limited to a determination of whether legislative provision is valid and nothing further." *Id.*

I. Plaintiffs are unlikely to succeed on the equal protection claim.

The Legislature's plenary power reaches public schools and not private schools. It has long adhered to this limit in the Oklahoma Constitution, which is the same limit that both other states and the federal government recognize. Its adherence to that limit is rational in this case, and the district court erred by finding Plaintiffs would likely succeed in a contrary argument. Public schools and private schools are, by design, distinct creatures treated in different manners in various contexts. To allow the trial court's flawed equal protection analysis to stand would upend those systems well beyond the narrow topic presented (mask mandates), unlawfully impact the Legislature's ability to make policy regarding public schools, and even wrongly affect the more independent nature of private schools.

A. The Legislature has broad authority over public schools but does not have that same authority over private schools.

As a general matter, the Oklahoma Legislature has authority over "all rightful subjects of Legislature." OKLA. CONST. art. 5, § 36. Unlike the federal Congress, which can only exercise enumerated powers, the Oklahoma Legislature can exercise any powers not prohibited by the Oklahoma Constitution. *Id.*; *see Naifeh v. State ex rel. Oklahoma Tax Comm'n*, 2017 OK 63, ¶ 11; *Fair Sch. Fin. Council*, 1987 OK 114, ¶ 58 This general power can be expanded or limited by the Oklahoma Constitution.

For schools in particular, the Oklahoma Constitution grants the Legislature even greater power over public schools than it would have by default. The Oklahoma Constitution imposes

the duty on the Oklahoma Legislature to establish and maintain a system of free public schools. OKLA. CONST. art. 1, § 5; *id.* art. 13, §§ 1, 5. That duty "carries with it" expansive power over public schools in Oklahoma. *Sch. Dist. No. 25*, 1947 OK 220, ¶ 12; *see Okla. Educ. Ass'n v. State ex rel. Okla. Legislature*, 2007 OK 30. Because the Legislature's policy-making power specifically includes public education, the judiciary may not interfere with that power "either directly or indirectly." *Okla. Educ. Ass'n*, 2007 OK 30, ¶ 19; *see* OKLA. CONST. art. 4, § 1. When the Legislature's compliance with constitutional provisions regarding education is challenged, "the only justiciable question is whether the Legislature acted within its powers." *Fair Sch. Fin. Council*, 1987 OK 114, ¶ 62. "The determination of the policy to be pursued. . . in matters of education is a question that rests solely with the Legislature." *Okla. Educ. Ass'n*, 2007 OK 30, ¶ 21 (quoting *Hodge*, 1947 OK 220, ¶ 2).

The grant of authority matters to this appeal because the Oklahoma Constitution grants that broad power over public schools and *not* over private schools. This choice by the Constitution's drafters creates different standards of review for the different school systems. Absent a suspect classification, due process clause challenges to public school policy require evidence "that a child is not receiving *at least a basic adequate education.*" *Fair Sch. Fin. Council*, 1987 OK 114, ¶ 63. Challenges that are otherwise meritorious must fail if they lack that evidence, even if education is a fundamental right. *See id.* Public schools are only exempt from such challenges because the Legislature's specific constitutional duty to them controls over any other more general provision of the Oklahoma Constitution, meaning that state law does not violate the more general Due Process Clause by complying with the Legislature's specific duty to issue laws directed to public schools, not private schools. *Cf. Assessments for Tax Year 2012 of Certain Properties Owned by Throneberry v. Wright*, 2021 OK 7, ¶ 16, 481 P.3d 883, 893 ("A well-known canon of statutory construction states a specific statute controls a general statute on the same subject.").

This constitutional limit on challenges to public school policy does not apply to challenges to private school policy. Any policies imposed on private schools *are* subject to due process challenges because there is no specific provision committing their regulation to the Legislature. As a result, the Legislature cannot impose the same policies on private schools because its power is not plenary over them. The trial court's analysis, taken to its logical end, would result in either the Legislature's ability to impose policies on private schools or the Legislature's inability to impose policy on public schools. Such an outcome lacks legal warrant and without requisite Legislative measures, would forever alter educational institutions that have long existed.

B. The Legislature has a long history of separately addressing public and private schools.

Oklahoma has long treated public schools and private schools differently. The Legislature has frequently legislated policy issues to public schools and rarely legislated policy issues to private schools. As a result, very few provisions of title 70 apply to private school.

Beyond the mask rules at issue, state law is full of provisions that apply to public schools alone. For example, several school discipline provisions only apply to public schools. *See* 70 O.S. § 24-100.4. Prohibitions on guns or alcohol on campus also only apply to public schools. *See id.* § 24-101.3, 24-138. The Safe School Committee program for fighting bullying is only a public school program. *See id.* § 24-100.5. The recognition of "Jim Thorpe Day" applies only to public schools. *See id.* § 24-130. The requirement to post signs addressing child abuse applies only to public schools. *See id.* § 1210.162. The qualification requirements for educational interpreters for deaf students apply only to public schools. *See id.* § 13-115.3. Only public schools are required to provide a minute of silence for students each day. *See id.* § 11-101.2. The Legislature has even enacted laws that solely affect public schools and further classify those public schools, separately treating public school districts as independent or dependent. *See, e.g.*, *In re Wickstrum*, 1969 OK 74,

¶ 13 (permitting such classifications). The examples of laws that apply to public schools alone are too numerous to fully list here.

There are very few exceptions to this general approach. At the broadest level, private schools may voluntarily submit to compliance with certain state regulations in exchange for being accredited by the state. *See* 70 O.S. § 3-104(7). Private schools must participate in the Tobacco-free Schools Act. *See id.* § 1210.213. Private schools must participate in a vaccine program for any student whose parents do not opt-out of the program. *See id.* §§ 1210.191-1210.193. Outside of these, very few state law obligations imposed on private schools exist.

Oklahoma is not unique in making this distinction between public and private schools. The federal government has long maintained that the due process clause of the federal constitution limits state regulation of private schools. *See Pierce v. Soc'y of the Sisters of the Holy Names of Jesus & Mary*, 268 U.S. 510, 535 (1925). To be sure, states can make certain reasonable regulations applicable to all schools. *See id.* at 534 (specifying types). Nevertheless, states cannot exercise the same regulatory power over private schools that they exercise over public schools because "the liberty of parents and guardians to direct the upbringing and education of children" necessarily "excludes any general power of the state to standardize its children" when the parents choose to send them to private schools. *Id.* at 534-35. In other words, States need a much more particularized reason to regulate private schools than they do to regulate their own public schools.

The federal government even recognizes this distinction in its own statutes. Perhaps one of the more well-known examples is the Individuals with Disabilities in Education Act (IDEA). Under IDEA, private school children with disabilities "do not have an individual entitlement to services they would receive if they were enrolled in a public school." *The Individuals with Disabilities Education Act: Provisions Related to Children With Disabilities Enrolled by Their Parents in Private Schools,*

U.S. DEP'T OF EDUC., Mar. 2011.[3] Instead, public schools make equitable services available to private school students should they be interested in using such services at the public school while still otherwise enrolled in a private school. *Id.*; *see* 20 U.S.C. § 1412(a)(10). As a result, students with disabilities receive greater protection in public schools than in private ones, drawing a clear distinction between the public agencies and the private institutions.

Beyond the federal government, other states apply this same distinction. The Ohio Supreme Court has concluded that the state necessarily violates parents' liberty interests if it "eradicate[s] the distinction between public and non-public education." *State v. Whisner*, 351 N.E.2d 750, 768 (Ohio 1976). Other states generally agree. *See, e.g., Blount v. Dep't of Educ. & Cultural Servs.*, 551 A.2d 1377, 1382 (Me. 1988); *State ex rel. Douglas v. Faith Baptist Church of Louisville*, 301 N.W.2d 571, 579 (Neb. 1981); *Ky. State Bd. for Elementary & Secondary Ed. v. Rudasill*, 589 S.W.2d 877, 884 (Ky. 1979).

C. The Legislature may rationally distinguish between public and private schools.

In line with its long practice of treating public schools and private schools differently, the Legislature may rationally treat them differently regarding masks. Nothing in the Oklahoma Constitution compels a different result.

At the outset, it is not clear that the equal protection challenge under the Oklahoma due process clause in this case is justiciable. Absent a suspect classification, due process clause challenges to educational policy require evidence "that a child is not receiving *at least a basic adequate education.*" *Fair Sch. Fin. Council*, 1987 OK 114, ¶ 63. Challenges that are otherwise meritorious must fail if they lack that evidence. Even assuming education is a fundamental interest, the only educational right in our constitution is the right to a basic, adequate education—nothing more. *See*

[3] https://www2.ed.gov/admins/lead/speced/privateschools/report_pg2.html

id. ¶ 60. Oklahoma is not denying anyone a basic education with the mask provisions of SB 658. Plaintiffs did not argue otherwise in the district court. Thus, under existing precedent, no justiciable question is presented.

Assuming the claim were justiciable, the classifications here are neither suspect nor irrational. "When called upon to analyze a case on equal protection grounds, a court will apply one of three standards of review; (a) rational basis, (b) heightened scrutiny, or (c) strict scrutiny." *Gladstone v. Bartlesville Indep. Sch. Dist. No. 30*, 2003 OK 30, ¶ 9 & n.22; *see also Butler v. Jones ex rel., State ex rel., Okla. Dep't of Corr.*, 2013 OK 105, ¶ 12 (noting that the analysis is the same under both the state and federal constitutions). Classifications are not measured by whether they discriminate, but by whether they discriminate impermissibly or invidiously. *Butler*, 2013 OK 105, ¶ 11.

Strict scrutiny is required if the classification is "based on race, alienage or ancestry"—a suspect class. *Gladstone*, 2003 OK 30 ¶ 9. Under strict scrutiny, a court examines whether the distinctions are necessary to advance a compelling governmental interest. *Thayer v. Phillips Petroleum Co.*, 1980 OK 95, ¶ 13. "If the classification does not implicate a suspect class or abridge a fundamental right, the rational-basis test is used." *Gladstone*, 2003 OK 30 at ¶ 9 & n.22.

Under rational basis review, a court examines whether "the legislative means are rationally related to a legitimate governmental purpose." *Id.* at ¶ 9. In such review, the court "must be aware 'that the drawing of lines that create distinctions is peculiarly a legislative task and an unavoidable one. Perfection in making the necessary classifications is neither possible nor necessary.' " *Butler*, 2013 OK 105, ¶ 13 (quoting *Mass. Bd. of Reitirement v. Murgia*, 427 U.S. 307, 314 (1979)).

To start, the district court's order is plainly errant because it imposes heightened scrutiny on the public school / private school distinction. No authority supports the proposition that such distinctions are *suspect* classifications. In fact, the Oklahoma Constitution itself discriminates between public and private schools, giving the Legislature plenary control over public schools

alone. OKLA. CONST. art. 1, § 5; *id.* art. 13, §§ 1, 5. Yet the district court enjoined Appellants because it found no "compelling interest" to support the distinction here. Tr. at 26. In other words, the court applied the strict scrutiny test, *see Thayer*, 1980 OK 95, ¶ 13, implicitly finding that the distinction is a suspect classification. This court can and should reverse the district court for that error alone, holding that distinguishing between public schools and private schools is not a suspect classification.

Should this Court perform rational basis review itself in the first instance, then it should hold that no mask provision nor any other statute affecting methods of providing a public education needs to apply to private schools to be constitutional. This distinction in the Oklahoma Constitution and in Section 1210.190(A) is reasonable because it gives the state greater power over public agencies than over private businesses and because it protects parental choice in education.

Distinguishing between public agencies (like public schools) and private entities is rational. Public agencies exercise statutory authority. *See Okla. Pub. Emps. Ass'n v. Okla. Dep't of Cent. Servs.*, 2002 OK 71, ¶ 25. Private entities do not exercise that authority and, as a result, are necessarily not confined by its limits. They are "not controlled by or answerable to the public." *Sullins v. Am. Med. Response of Okla, Inc.*, 2001 OK 20, ¶ 20. Because those who run public schools are public employees exercising powers of the state, much more so than private schools, they are the responsibility of the Legislature, subject to legislative oversight and control. They are exercising the power of the state and therefore, unlike with private schools, the Legislature is directly responsible for placing limits on that power, including forcing mask mandates. The Oklahoma Constitution does not subject private entities to plenary State control merely because they compete with public institutions to offer the same service—here, education. The Legislature rationally adheres to this limit on its ability to regulate private businesses.

This distinction between public agencies and private entities is also practical because of their separate funding sources. Public schools are spending public money, implementing fiscal policy that is within the control of the Legislature. *See Okla. Educ. Ass'n*, 2007 OK 30, ¶ 20. They can also lose that funding if they mismanage state money. The Legislature is rationally concerned that public dollars that it controls are not used to violate public policy on mask mandates. In contrast, the Legislature rationally has less of an interest in how private dollars are used in private schools, and it is unclear how the Legislature would discipline private schools that do not follow its requirements. Private schools are spending private money in the way that tuition-paying parents see fit, and the Legislature does not exercise fiscal policy control over an institution that it does not fund. If left intact, the trial court's determination could altogether change that.

Beyond the rational allocation of power, the mask provisions of SB 658 also address parental choice concerns that are particular to public schools and not private ones. In the private school context, parents' consent to private school policies directly (such as mask mandates) when they choose to enroll their children in a particular school. But for economic reasons or otherwise, parents whose children are in public schools lack a similar choice in school. As a result, the Legislature needs to be more protective of parents' liberty interests in public schools than private. A parent who sends their child to a private school always has their freedom of choice because they can choose to send their student and money to a different school if they are dissatisfied with the restrictions at that private school. Thus, if a parent does not agree with a private school's mask mandate, they can send their children to their local public school, where SB 658 guarantees their child will not be forced against their will to wear a mask. The same liberty does not exist in the same way at a public school, where parents often cannot avoid a restrictive public school because of their own resource constraints (*e.g.*, they cannot afford a private school or to move to a different public school district) or because of a lack of viable local options. Thus, the Legislature was

perfectly rational in applying SB 658's mask mandate provision only to public schools and not to private schools.

Finally, the Legislature does not need to avoid all regulation of private schools in order to rationally distinguish between public and private schools. It may choose to impose certain regulations on private schools without regulating them identically to public schools, and in fact is obligated *not* to regulate them identically. *See supra* Part I.A.1. This rule is no different with health and safety regulations than it is with any other category of school regulation. Thus, the district court was wrong when it held that the application of some state laws regarding vaccines to private schools meant that all public school health and safety laws must apply to private schools. Tr. at 26, 28. Such a rule would inappropriately collapse the distinction between public and private schools, restraining the Legislature to only pass health and safety regulations for public schools that could also survive the scrutiny applied to private school regulations. Such a regime would either (1) give the Legislature plenary power over both public and private schools by insulating all its educational laws from review or (2) effectively strip the Legislature of its plenary power over public schools by subjecting its laws to scrutiny as private school regulations. The constitutionally conferred plenary power over public schools *alone* is intended to avoid both harms.

In short, by applying only to public schools, the mask provisions of SB 658 rationally adhere to the distinction the Oklahoma Constitution makes. They recognize the distinction in state power over public agencies and private employers, and they reasonably address a parental choice issue that is particular to public schools. For this reason and the other reasons discussed above, even if SB 658 is judicially reviewable, it survives rational basis review.

D. Plaintiffs are unlikely to succeed in piercing sovereign immunity.

Regardless of the merits of their claims, Plaintiffs are also unlikely to prevail against one of the Defendants. While the Governor may be sued in his official capacity, the State of Oklahoma

is immune from suit absent a legislative waiver of that immunity. *See Freeman v. State ex rel. Dep't of Hum. Servs.*, 2006 OK 71, ¶ 8. No such waiver has occurred here, nor is there any assertion of such a waiver in Plaintiffs' pleadings. The district court also entered no findings to justify setting aside sovereign immunity before entering an injunction against the State. Thus, given the lack of arguments or authority regarding sovereign immunity in Plaintiffs' motion or the district court's findings, the district court erred by enjoining the State as a party.

II. Equity counsels against the injunction here.

Expanding state legislative control over private schools helps no one. Plaintiffs are not being harmed by private schools being exempt from public school laws, as none of their asserted harms would be remedied if the state extended public school laws to private schools. Instead, they are merely seeking to use private schools as a foil to disrupt state authority over public schools. Thus, while the injunction nominally addresses state authority over private schools, it practically alters state authority over public schools.

This result is clear from the way public school districts are behaving under the injunction. Several public school districts have started acting as though they are exempt from state authority. For example, Edmond Public Schools demands that parents sign statements contradicting state law and assuming some sort of liability before being allowed to receive mask exemptions. *See Consent Form*, Edmond Public Schools.[4] Other school districts go even farther: Tulsa Public Schools publicly refuses to allow the personal exemptions required by the injunction itself.[5] These school districts apparently assume that this rule about regulating private schools means that they

[4] https://north.edmondschools.net/wp-content/uploads/sites/7/2021/09/Mask-Opt-Out-Form-2021.pdf

[5] TPS did, on inquiry from the Attorney General, decide to start honoring personal exemptions, but its public literature still warns parents to only claim more limited exemptions. *See COVID-19 Response*, Tulsa Public Schools, https://www.tulsaschools.org/student-and-family-support/school-safety#covid.

are free to disregard their role as public entities under state authority. The Legislature has avoided giving public schools this sort of authority over certain health issues (like vaccines, committed to the Health Department) precisely because schools are not equipped to administer this authority without abusing it. Yet the result of injunction has been to undermine the Legislature's approach.

The injunction has also stripped parents of input into their public school boards' decisions. Under state law, any mask mandate is subject to reconsideration and input "at each regulated scheduled board meeting." 70 O.S. § 1210.190(A)(4). Yet under the injunction, school districts have decided to flout even the procedural requirements of state law. And a more broad injunction that Plaintiffs seek (*i.e.*, one without exemptions) would harm the parents and students who do not want masks forced upon students despite medical, religious, or personal objections to them.

Meanwhile, all of the non-party parents and students who attend private schools will be harmed by the inevitable results of this injunction. They have funded their own education apart from the public schools in order to be separate from public school regulations. Yet if the injunction stands, the Oklahoma Legislature will be obligated to regulate those private schools like public schools just so that the Legislature can maintain its authority over its own public schools in court.

All of these unjust results should not be compelled by any fair reading of the Oklahoma Constitution. As a result, equity weighs against the injunction here.

CONCLUSION

For the reasons stated, this Court should hold that the Oklahoma Legislature has plenary authority over public schools alone and can reasonably regulate them differently from private schools, vacating the district court's injunction.

DATED: November 8, 2021.

Respectfully submitted,

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