

## CERTIFICATE OF COMPLIANCE

No.

DEPUTY JAMES DAWSON, individually and in his official capacity; SHERIFF JOHN WILSON, in his official capacity; CLARE COUNTY,

Petitioners,

v.

## JOSHUA BRENNAN,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Conditional Cross-Petition for Writ of Certiorari contains 2,743 words, excluding the parts of the Cross-Petition 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 February 14, 2019.

Julie A. Kershner

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Sworn to and subscribed before me by said Affiant on the date designated below.

Date: Februs 14, 2019

John B. Dally

Notary Public

[seal]

JOHN D. GALLAGHER Notary Public, State of Ohio My Commission Expires February 14, 2023