

CERTIFICATE OF COMPLIANCE

No. 18-110 Andrew Burningham, et al.,

Petitioners,

v.

JOHN MORRISON RAINES, III, GUARDIAN OF THE ESTATE OF JOHN MORRISON RAINES, IV,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* International Municipal Lawyers Association in Support of Petitioners contain 4,499 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 August 23, 2018.

Donna J. Wolf

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

Date

Notary Public

[seal]



JULIE ANNE KERSHNER Notary Public, State of Ohio My Commission Expires February 21, 2023