



CERTIFICATE OF COMPLIANCE

No. 18-422, 18-726

ROBERT A. RUCHO, *et al.*,

Appellants,

v.

COMMON CAUSE, *et al.*,

Appellees.

LINDA H. LAMONE, *et al.*,

Appellants,

v.

O. JOHN BENISEK, *et al.*,

Appellees.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of International Municipal Lawyers Association, National League of Cities, U.S. Conference of Mayors, and the International City/County Management Association as *Amici Curiae* in Support of Appellees contains 8,161 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 March 8, 2019.

Julie A. Kershner

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

Date: March 8, 2019

John D. Gallagher
Notary Public

[seal]



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