



CERTIFICATE OF COMPLIANCE

No. 18-881

AMERICAN FUEL & PETROCHEMICAL
MANUFACTURERS, *et al.*,

Petitioners,

v.

JANE O'KEEFFE, *et al.*,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Law Professors as *Amici Curiae* Supporting Petitioners contains 4,629 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 February 8, 2019.

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

Date: February 8, 2019

John D. Gallagher

Notary Public

[seal]



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