



CERTIFICATE OF COMPLIANCE

No. 19-1352

WESTERN OILFIELDS SUPPLY COMPANY,
DOING BUSINESS AS RAIN FOR RENT,

Petitioner,

v.

SECRETARY OF LABOR AND FEDERAL MINE SAFETY
AND HEALTH REVIEW COMMISSION,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner contains 1,954 words, excluding the parts of the 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 September 21, 2020.



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

Date: September 21, 2020

John D. Gallagher

Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, **State of Ohio**
My Commission Expires
February 14, 2026