



**CERTIFICATE OF COMPLIANCE**

No. 19-1392

THOMAS E. DOBBS, STATE HEALTH OFFICER OF THE  
MISSISSIPPI DEPARTMENT OF HEALTH, *et al.*,  
*Petitioners,*

v.

JACKSON WOMEN'S HEALTH ORGANIZATION, *et al.*,  
*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Professor Kurt T. Lash as *Amicus Curiae* in Support of Petitioners contains 7,706 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 July 27, 2021.

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

Date: 7/27/21

[Signature]  
Notary Public

[seal]



AMY TRIPLETT MORGAN  
Attorney at Law  
Notary Public, State of Ohio  
My Commission Has No Expiration  
Date. Section 147.03 O.R.C.