



CERTIFICATE OF COMPLIANCE

No. \_\_\_\_\_

JERI LYNN RICH, as representative for Gavrilă Covaci  
Dupuis-Mays, an incapacitated person,

*Petitioner,*

v.

MICHAEL PALKO, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I  
certify that the Petition for Writ of Certiorari contains  
8,560 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 August 5, 2019.

Julie A. Kershner  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

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

Date: August 5, 2019

John D. Gallagher

Notary Public

[seal]



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