



CERTIFICATE OF COMPLIANCE

No. 19-539

OFFICE OF RECOVERY SERVICES,

Petitioner,

v.

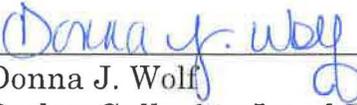
JOHN R. LATHAM,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner contains 2,993 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 December 23, 2019.



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

Date: December 23 2019

J.A. Kershner
Notary Public

[seal]



JULIE ANNE KERSHNER
Notary Public, State of Ohio
My Commission Expires
February 21, 2023