



CERTIFICATE OF COMPLIANCE

No. 19-956

DONALD E. CRAIG, ET AL.,

Petitioners,

v.

JANET TURNER O'KELLEY, INDIVIDUALLY AND AS
PERSONAL REPRESENTATIVE OF THE ESTATE OF JOHN
HARLEY TURNER, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* International Municipal Lawyers Association in Support of Petition for Writ of Certiorari contains 5,652 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 March 2, 2020.



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

Date: March 22, 2020

J.A.K.
Notary Public

[seal]



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