



CERTIFICATE OF COMPLIANCE

No. 20-107

CEDAR POINT NURSERY, ET AL.,

Petitioners,

v.

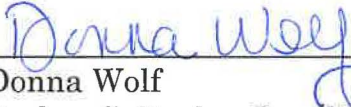
VICTORIA HASSID, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Local Governments as Amici Curiae in Support of Respondents contains 5,972 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 February 12, 2021.



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

Date: February 12, 2021

John D. Gallagher

Notary Public

[seal]



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