

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 20-1072

Chad Thompson, William T. Schmitt, and Don Keeney,

Petitioners

v.

Richard Michael DeWine, Governor of Ohio; Stephanie McCloud, Director of Ohio
Dep't of Health; and Frank LaRose, Ohio Secretary of State,

Respondents.

As required by Supreme Court Rule 33.1(h), I, Mark R. Brown, certify that the Reply Brief for Petitioners in the foregoing case contains 2,988 words, excluding the parts of the document that are excluded by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 30, 2021.

/s/ Mark R. Brown

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