



CERTIFICATE OF COMPLIANCE

No. 20-109

SCOTT SCHWAB, *in his official capacity as Secretary
of State for the State of Kansas,*

Petitioner,

v.

STEVEN WAYNE FISH, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner contains 2,377 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 November 16, 2020.

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

Date: November 16, 2020

John D. Gallagher
Notary Public

[seal]



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