



## CERTIFICATE OF COMPLIANCE

No. 20-1171

MICHAEL MADISON,

*Petitioner,*

v.

STATE OF OHIO,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Respondent's Brief in Opposition Capital Case-Execution Date Set May 15, 2024 contains 5,921 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 29 2021.

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

Date: March 29, 2021  
John D. Gallagher

Notary Public

[seal]



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