



**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.

---

Emily Mullins  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

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