

## CERTIFICATE OF COMPLIANCE

No. 20-1351

PHILLIP W. HURD AND PATRICK A. JENKINS,

*Petitioners,*

v.

JOY LASKAR, PH.D.,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Response to Petition for a Writ of Certiorari contains 8,362 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 April 21, 2021.



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

Date: April 21, 2021  
John D. Gallagher  
Notary Public

[seal]



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