



CERTIFICATE OF COMPLIANCE

No. 20-1824

VINCENT LUCAS,

*Petitioner,*

v.

TRICIA MOORE, MARCIA PHELPS, LICKING COUNTY,  
OHIO, AND THE CITY OF NEWARK, OHIO,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition contains 1,574 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 August 2, 2021.

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

Date: August 2, 2021

John D. Gallagher

Notary Public

[seal]



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