

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 Reply Brief contains 1182 words, excluding
the parts of the petition 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 6, 2021



Vincent Lucas