

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

A handwritten signature in black ink, appearing to read 'Vincent Lucas', is written over a horizontal line.

Vincent Lucas