

CERTIFICATE OF COMPLIANCE

No. 20-220

VBS DISTRIBUTION, INC., ET AL.,

Petitioners,

v.

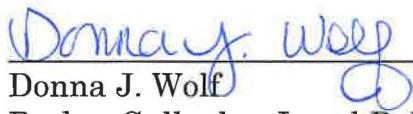
NUTRIVITA LABORATORIES, INC., ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Motion for Leave to File Brief as *Amicus Curiae* and Brief for Dean Erwin Chemerinsky as *Amicus Curiae* in Support of Petitioners contains 277 words and 3,854 words, respectively, 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 September 24, 2020.



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

Date: September 24, 2020
John D. Gallagher

Notary Public

[seal]



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