



**CERTIFICATE OF COMPLIANCE**

No. 20-427

POLK COUNTY,

*Petitioner,*

v.


J.K.J. and M.J.J.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner contains 2,791 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 December 23, 2020.

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

Date: December 23, 2020

John D. Gallagher

Notary Public

[seal]



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