

IN THE
Supreme Court of the United States

NATHANIEL OGLE,
Petitioner,

v.

OHIO CIVIL SERVICE EMPLOYEES ASSOCIATION,
AFSCME LOCAL 11, AFL-CIO,
Respondent.

**On Petition for Writ of Certiorari to the United States
Court of Appeals for the Sixth Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Reply to Brief in Opposition in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 2,622 words, excluding the parts 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 29, 2020.

/s/ William L. Messenger

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