

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 20-5243

Warren Keith Henness,

*Petitioner,*

v.

Mike DeWine, et al.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I, Jean-Claude André, certify that the Reply Brief for Petitioner in the foregoing case contains 2,947 words, excluding the parts of the document 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 19, 2020.

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