IN THE

Supreme Court of the United States

SHASE HOWSE

Petitioner,

v.

THOMAS HODOUS, INDIVIDUALLY AND IN HIS
OFFICIAL CAPACITY AS AN EMPLOYEE OF THE CITY OF
CLEVELAND, OHIO; BRIAN MIDDAUGH, INDIVIDUALLY
AND IN HIS OFFICIAL CAPACITY AS AN EMPLOYEE OF
THE CITY OF CLEVELAND, OHIO

Respondents.

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), I certify that the Reply Brief in Support of Certiorari contains 2,993 words, excluding parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on the 12th day of February, 2021.

Samuel Spital Counsel of Record