



**CERTIFICATE OF COMPLIANCE**

No. 20-641

LSP TRANSMISSION HOLDINGS, LLC,

*Petitioner,*

v.

KATIE SIEBEN, ET AL,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner contains 2,981 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 February 10, 2021.

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

Date: 2/10/2021

Bianca Becker  
Notary Public

[seal]



**BIANCA BECKER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023