

CERTIFICATE OF COMPLIANCE

No. 20-740

---

IN THE  
SUPREME COURT OF THE UNITED STATES

---

JIM BOGNET, *et al.*,

*Petitioners,*

vs.

VERONICA DEGRAFFENREID, in her capacity as  
Acting Secretary of the Commonwealth of Pennsylvania;  
WASHINGTON COUNTY BOARD OF ELECTIONS, *et al.*,

*Respondents.*

---

As required by Supreme Court Rule 33.1(h), I certify that the Brief in  
Opposition contains 716 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 March 15, 2021

---

Respectfully submitted,

/s/ Frank J. Lavery, Jr.

Frank J. Lavery, Jr., Esquire  
Pennsylvania Supreme Court I.D.: 42370  
Lavery Law  
225 Market Street, Suite 304  
Harrisburg, PA 17319  
(717) 233-6633  
flavery@laverylaw.com