



CERTIFICATE OF COMPLIANCE

No. 20-953

MICHAEL D. ELLIS,

Petitioner,

v.

LIBERTY LIFE ASSURANCE COMPANY OF BOSTON, A
NEW HAMPSHIRE CORPORATION,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief in Support of Certiorari contains 2,831 words, excluding the parts of the Petition 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 April 8, 2021.

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

Date: April 8, 2021

John W. Kuegel
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023