



CERTIFICATE OF COMPLIANCE

No. 21-1006

MARC S. KIRSCHNER,

*Petitioner,*

v.

DENNIS J. FITZSIMONS, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amica Curiae* Deborah A. Demott in Support of Petitioner contains 3,438 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 14, 2022.

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

Date: February 14, 2022

John D. Gallagher  
Notary Public

[seal]



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