



CERTIFICATE OF COMPLIANCE

No. 21-1535

DAVID LOWERY,

Petitioner,

v.

BENJAMIN JOFFE, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Attorneys General of Arizona, Alabama, Alaska, Arkansas, Florida, Idaho, Indiana, Kansas, Kentucky, Louisiana, Mississippi, Missouri, Montana, Nebraska, North Dakota, Oklahoma, South Carolina, Texas, Utah, and Virginia as *Amici Curiae* in Support of Petitioner contains 2,985 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 July 7, 2022.

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

Date: July 7, 2022

John D. Gallagher

Notary Public

[seal]



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