

No. 21-226

In the Supreme Court of the United States

Libertarian Party of Ohio and Harold Thomas,
Petitioners,

v.

Don Michael Crites, Otto Beatty, III, Dennis Brommer,
Catherine A. Cunningham, Natasha Kaufman, A. Scott Norman,
and Charleta B. Tavares, in their official capacities,
Respondents.

**On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Sixth Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that the Reply Brief contains 3,135 words, excluding the parts of the document 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 September 27, 2021.



Stuart Banner
UCLA School of Law
405 Hilgard Ave.
Los Angeles, CA 90095
(310) 206-8506
banner@law.ucla.edu
Counsel for Petitioners