



CERTIFICATE OF COMPLIANCE

No. 21-476

303 CREATIVE LLC, *et al.*,

*Petitioners,*

v.

AUBREY ELENIS, *et al.*,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Professor Christopher R. Green Supporting Petitioners contains 7,995 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 June 2, 2022.

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

Date: June 2, 2022

John D. Gallagher  
Notary Public

[seal]



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