



CERTIFICATE OF COMPLIANCE

No. _____

MICHIGAN EDUCATION ASSOCIATION FAMILY RETIRED
STAFF ASSOCIATION, GLENNA PARKER,
AND CAROLEE SMITH,

Petitioners,

v.

MICHIGAN EDUCATION ASSOCIATION, MICHIGAN
EDUCATION SPECIAL SERVICES ASSOCIATION, AND
MEA FINANCIAL SERVICES, INC.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 3,686 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 October 21, 2021.

Heather Campbell
Heather Campbell
Becker Gallagher Legal Publishing, Inc.
8790 Governor's Hill Drive, Suite 102
Cincinnati, OH 45249
(800) 890-5001

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

Date: October 21, 2021

John D. Gallagher

Notary Public

[seal]



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