

Supreme Court of the United States United States Courts of Appeals

CERTIFICATE OF COMPLIANCE

No. 21-603

STATE OF OHIO,

Petitioner,

v.

GEORGE BRINKMAN,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for the Petitioner contains 2,131 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 January 11, 2022.

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BECKER GALLAGHER LEGAL PUBLISHING INCORPORATED (800) 890.5001 www.beckergallagher.com 8790 Governor's Hill Drive Suite 102 Cincinnati, Ohio 45249 Franklin Square 1300 I Street, NW, Suite 400E Washington, DC 20005 Sworn to and subscribed before me by said Affiant on the date designated below.

Date: _ he D. Sulla Notary Public

[seal]



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