

CERTIFICATE OF COMPLIANCE

No. 21-638

DAVID R. WATKINS AND THEODORE H. FRANK,
Petitioners,

v.

BRIAN SPECTOR, ET AL.,
Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Montana, Louisiana, Texas, and Utah as Amici Curiae Supporting Petitioners contains 2,997 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 December 1, 2021.



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

Date: December 1, 2021

John D. Gallagher

Notary Public

[seal]



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