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November 2, 2021

Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

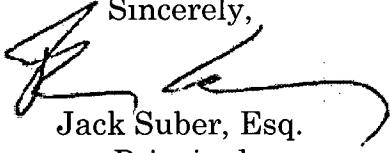
RE: PATRICK J. DOWNEY v. CITY OF TOLEDO

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari referenced above contains **7,562** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

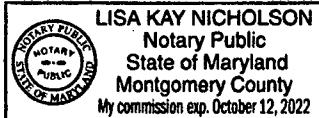
I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Jack Suber, Esq.

Principal



Sworn and subscribed before me this 2nd day of November 2021.

