

## CERTIFICATE OF COMPLIANCE

No. 21-859

THE MONTANA STATE LEGISLATURE, ET AL.,

Petitioners.

v.

## BETH McLaughlin,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioners contains 2,927 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 March 2, 2022.

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

Date: M(17ch 2, 2027

Notary Public

[seal]



HEATHER CAMPBELL

Attorney at Law
Notary Public, State of Ohio
My Commission Has No Expiration
Date. Section 147.03 O.R.C.