



**CERTIFICATE OF COMPLIANCE**

Nos. 21A244, 21A247

NATIONAL FEDERATION OF INDEPENDENT BUSINESS,  
ET AL., *Applicants*,

v.

DEPARTMENT OF LABOR, OCCUPATIONAL SAFETY AND  
HEALTH ADMINISTRATION, ET AL., *Respondents*.

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OHIO, ET AL., *Applicants*,

v.

DEPARTMENT OF LABOR, OCCUPATIONAL SAFETY AND  
HEALTH ADMINISTRATION, ET AL., *Respondents*.

As required by Supreme Court Rule 33.1(h), I certify that the Motion for Leave to File; and Amici Brief of Two Unnamed Workers in Support of Application for Stay, Grant of Certiorari, and Reversal contains 191 and 1,470 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 6, 2022.

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

Date: January 6, 2022

John D. Gallagher  
Notary Public

[seal]



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