



**CERTIFICATE OF COMPLIANCE**

No. \_\_\_\_

BARBARA KOLKOWSKI,

*Petitioner,*

v.

ASHTABULA AREA TEACHER'S ASSOCIATION, OHIO  
EDUCATION ASSOCIATION, AND  
ASHTABULA AREA CITY SCHOOLS,

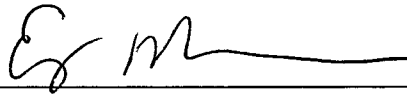
*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 8,426 words, excluding the parts of the Petition that are exempted by Supreme Court Rule 33.1(d).

State of Ohio  
County of Hamilton

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

Executed on April 12, 2023.



Emily Mullins  
Becker Gallagher Legal Publishing, Inc.  
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Cincinnati, OH 45249  
(800) 890-5001

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

Date: April 12, 2023

John D. Gallagher  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2028