## CERTIFICATE OF COMPLIANCE

No. 22-1199

## ROGAN O'HANDLEY,

Petitioner,

v.

SHIRLEY WEBER, in her official capacity as California Secretary of State, & TWITTER INC.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Reply in Support of Petition for Writ of Certiorari contains 2,755 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 October 3, 2023.

Donna J. Moore

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

Date: 10-3-207

Notary Public

[seal]

DOUGLAS S. MOORE
Notary Public, State of Ohio
My Commission Expires
December 18, 2027