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No. 22-293

ANTHONY NOVAK,
Petitioner,

v.

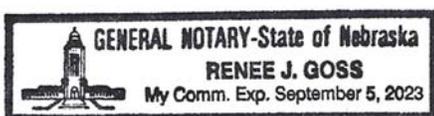
CITY OF PARMA, OHIO; KEVIN RILEY and
THOMAS CONNOR, individually and in their official
capacities as employees of the City of Parma, Ohio,
Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF THE UNION AS AMICUS CURIAE IN SUPPORT OF PETITIONER in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 4067 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 3rd day of October, 2022.

I am duly authorized under the laws of the State of Nebraska to administer oaths.



Renee J. Goss

Notary Public

Andrew H. Cockle

Affiant