

CERTIFICATE OF WORD COUNT

No. 23-12

John P. Kowal,

Petitioner,

v.

**Ferndale Area School District and
Ferndale Area School District Board of Education,**

Respondents.

STATE OF PENNSYLVANIA)
COUNTY OF CAMBRIA) SS.:

Being duly sworn, I depose and say that, as required by Supreme Court Rule 33.1(h), I certify that the JOHN P. KOWAL REPLY BRIEF contains 2998 words, including the parts of the brief that are required or exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

/s/ John P. Kowal

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September 15, 2023