

CERTIFICATE OF COMPLIANCE

No. 23-179

ALASKA, ET AL.,

Petitioners,

V.

ALASKA STATE EMPLOYEES ASSOCIATION/AMERICAN FEDERATION OF STATE, COUNTY AND MUNICIPAL EMPLOYEES LOCAL 52, AFL-CIO,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* the Buckeye Institute in Support of Petitioners contains 3,662 words, excluding the parts of the Brief 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 September 29, 2023.

Donna J. Moore

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(800) 890-5001

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

Date:

Notary Public

[seal]

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