



**CERTIFICATE OF COMPLIANCE**

No. \_\_\_\_\_

HENRY H. HOWE,

*Petitioner,*

v.

STEVEN GILPIN, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 8,001 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 11, 2023.

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

Date: October 11, 2023  
John D. Gallagher  
Notary Public

[seal]



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