



CERTIFICATE OF COMPLIANCE

No. 23-500

JAMES GIMENEZ,

Petitioner,

v.

FRANKLIN COUNTY, WASHINGTON, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Project on Fair Representation as *Amicus Curiae* in Support of Petitioner contains 3,571 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 December 13, 2023.

Donna J. Moore
Donna J. Moore
Becker Gallagher Legal Publishing, Inc.
8790 Governor's Hill Drive, Suite 102
Cincinnati, OH 45249
(800) 890-5001

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

Date: December 13, 2023
John D. Gallagher
Notary Public

[seal]



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