



**CERTIFICATE OF COMPLIANCE**

No. 23-670

MARC S. KIRSCHNER, SOLELY IN HIS CAPACITY AS  
TRUSTEE OF THE MILLENNIUM LENDER CLAIM TRUST,  
*Petitioner,*

v.

JPMORGAN CHASE BANK, N.A., ET AL.,  
*Respondents.*

As required by Supreme Court Rule 33.1(h), I  
certify that the *Amicus Curiae* Brief of Prof. Joseph R.  
Mason in Support of Petitioner contains 3,686 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 January 22, 2024.

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: January 22, 2024  
John D. Gallagher  
Notary Public

[seal]



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