



CERTIFICATE OF COMPLIANCE

No. 23-729

ROEE KIVITI, ET UX.,

Petitioners,

v.

NAVEEN PRASAD BHATT,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Reply in Support of Certiorari contains 2,217 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 April 18, 2024.

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

Date: *April 18, 2024*

John D. Gallagher
Notary Public

[seal]



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