

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

Date: April 18, 2024  
John Gallagher  
Notary Public

[seal]



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