



## CERTIFICATE OF COMPLIANCE

No. 23-732

RICHARD PLISHKA,

*Petitioner,*

v.

THE BYZANTINE CATHOLIC DIOCESE OF PARMA, INC.,  
AND WILLIAM SKURLA,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner contains 2,956 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 February 20, 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: February 20, 2024  
John D. Gallagher  
Notary Public

[seal]



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