



CERTIFICATE OF COMPLIANCE

No. 23-74

DEBRA A. VITAGLIANO,

Petitioner,

v.

COUNTY OF WESTCHESTER, NEW YORK,

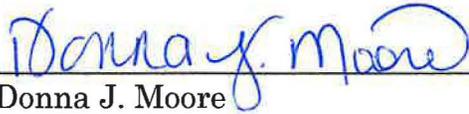
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Kentucky, Alabama, Arkansas, Idaho, Iowa, Mississippi, Missouri, Montana, Nebraska, South Carolina, Tennessee, Texas, Utah, and West Virginia as *Amici Curiae* Supporting Petitioner contains 4,374 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 August 24, 2023.



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

Date: August 24, 2023

John D. Gallagher
Notary Public

[seal]



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