



CERTIFICATE OF COMPLIANCE

No. 23-807

EL PAPEL, LLC, ET AL.,

Petitioners,

v.

CITY OF SEATTLE, WASHINGTON, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* the Buckeye Institute in Support of Petitioners contains 2,665 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 15, 2024.

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

Date: February 15, 2024
John D. Gallagher
Notary Public

[seal]



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