



CERTIFICATE OF COMPLIANCE

No. _____

STATE OF ARIZONA AND ARIZONA BOARD OF REGENTS,

Petitioners,

v.

MACKENZIE BROWN,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 8,500 words, excluding the parts of the Petition 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 January 25, 2024.

Donna J. Moore
Donna J. Moore
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Cincinnati, OH 45249
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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: January 25, 2024
John D. Gallagher
Notary Public

[seal]



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