



## CERTIFICATE OF COMPLIANCE

No. 23-812

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 Reply Brief for Petitioners contains 2,996 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 March 26, 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: 3-26-2024

Donna J. Moore  
Notary Public

[seal]



DOUGLAS S. MOORE  
Notary Public, State of Ohio  
My Commission Expires  
December 18, 2027