



**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.

Donna J. Moore  
Donna J. Moore  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

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

Date: 3-26-2024

Douglas S. Moore  
Notary Public

[seal]



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