

No. 23-820

In the Supreme Court of the United States

OHIO, *Petitioner*,

v.

WILLIAM JOHNSON.

CERTIFICATE OF COMPLIANCE WITH WORD LIMIT

I, Donald M. Falk, a member of the Bar of this Court, hereby certify that the accompanying Brief of Safe Living Space and Dr. Edie Zusman, MA, FAANS, as Amici Curiae in Support of the Petitioner, contains 2,808 words, exclusive of the sections excepted by Supreme Court Rule 33.1(d), and thus complies with the word limits of Rule 33.1(g)(x).

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