

CERTIFICATE OF COMPLIANCE

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

DOUGLAS BRUCE, an individual,
Petitioner,

v.

CITY OF MIAMISBURG, OHIO,
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains no more than 3902 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED ON February 9, 2024.

/s/ Aaron C. Garrett
Aaron C. Garrett, Bar No. 318386
Counsel of Record for Petitioner
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