## In the Supreme Court of the United States

OHIO DEPARTMENT OF REHABILITATION AND CORRECTION, DIRECTOR,

Petitioner,

v.

KAYLA JEAN AYERS,

Respondent.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the REPLY IN SUP-PORT OF CERTIORARI contains 2,209 words, excluding the parts of the document 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 April 21, 2025.

/s/ T. Elliot Gaiser
T. ELLIOT GAISER
Ohio Solicitor General

 $Counsel\ for\ Petitioner$