

**CERTIFICATE OF COMPLIANCE**

Case No. 18-944

Caption: *Tree of Life Christian Schools v. City of  
Upper Arlington, Ohio*

As required by Supreme Court Rule 33.1(h),  
I certify that the document contains 5,967 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 fore-  
going is true and correct.

Executed on February 15, 2019.

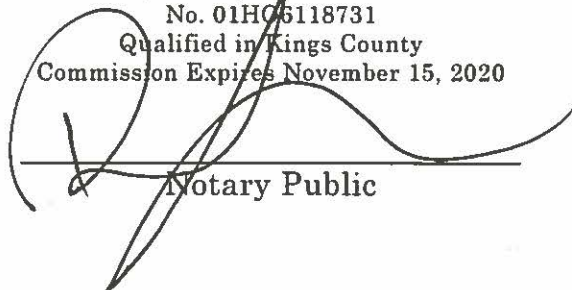


Teva Durham  
*Record Press, Inc.*

Sworn to before me on

February 15, 2019

RAMIRO A. HONEYWELL  
Notary Public, State of New York  
No. 01HC6118731  
Qualified in Kings County  
Commission Expires November 15, 2020



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Notary Public