



CERTIFICATE OF COMPLIANCE

No. 19-1392

THOMAS E. DOBBS, STATE HEALTH OFFICER OF THE  
MISSISSIPPI DEPARTMENT OF HEALTH, *et al.*,  
*Petitioners,*

v.

JACKSON WOMEN'S HEALTH ORGANIZATION, *et al.*,  
*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Local Governments as Amici Curiae in Support of Respondents contains 8,816 words, excluding the parts of the Brief 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 September 20, 2021.

Donna J. Wolf  
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: September 20, 2021

John D. Gallagher

Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023