



CERTIFICATE OF COMPLIANCE

No. 20-1088

DAVID AND AMY CARSON, AS PARENTS AND NEXT
FRIENDS OF O.C., ET AL.,

Petitioners,

v.

A. PENDER MAKIN,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amici Curiae* of the National Jewish Commission on Law and Public Affairs ("COLPA") and Other Orthodox Jewish Organizations in Support of Petitioners contains 2,024 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 10, 2021.

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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: September 10, 2021

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 11, 2023