



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 of Prof. Ashley R. Berner as *Amicus Curiae* in Support of Petitioners contains 5,653 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.

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 14, 2023