



CERTIFICATE OF COMPLIANCE

No. 20-157

EDWARD A. CANIGLIA,

*Petitioner,*

v.

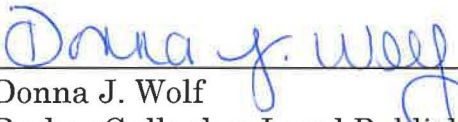
ROBERT F. STROM, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Project for Privacy & Surveillance Accountability and Restore the Fourth, Inc. as Amici Curiae Supporting Petitioner contains 4,780 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 January 15, 2021.

  
\_\_\_\_\_  
Donna J. Wolf  
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(800) 890-5001

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

Date: January 15, 2021

John D. Gallagher  
Notary Public

[seal]



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