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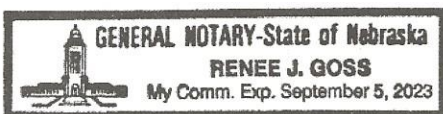
No. 20-1678

DANIEL Z. CROWE; LAWRENCE K. PETERSON;  
and OREGON CIVIL LIBERTIES ATTORNEYS,  
an Oregon nonprofit corporation,  
Petitioners,  
v.  
OREGON STATE BAR, a Public Corporation, et al.,  
Respondents.

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the SUPPLEMENTAL BRIEF FOR PETITIONERS in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 2556 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 8th day of September, 2021.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Renee J. Goss*  
Notary Public

*Andrew H. Cottle*  
Affiant