

In the  
**Supreme Court of the United States**

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OHIO, *ex rel.* ELLIOT FELTNER, *et al.*,  
*Petitioner*,  
v.

CUYAHOGA COUNTY BOARD OF REVISION,  
*Respondent*.

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On Petition for Writ of Certiorari  
to the Ohio Supreme Court

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the BRIEF  
*AMICUS CURIAE* OF GERALDINE TYLER IN SUPPORT OF PETITIONER  
contains 3,730 words, excluding the parts of the document 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 December 30, 2020

/s/Charles R. Watkins  
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