

No. 21-1454

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

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THE OHIO ADJUTANT GENERAL'S DEP'T, ET AL.,

*Petitioners,*

v.

FEDERAL LABOR RELATIONS AUTHORITY, ET AL.,

*Respondents.*

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CERTIFICATE OF COMPLIANCE

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As required by Supreme Court Rule 33.1(h), I certify that the REPLY IN SUPPORT OF PETITION FOR WRIT OF CERTIORARI contains 2,863 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 July 25, 2022.

*/s/ Benjamin M. Flowers*

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BENJAMIN M. FLOWERS

Ohio Solicitor General

*Counsel for Petitioners*