

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 21-312

VOLKSWAGEN AKTIENGESELLSCHAFT, ET AL.,

Petitioner,

v.

STATE OF OHIO *EX REL.* DAVE YOST, ATTORNEY GENERAL,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Carter G. Phillips, certify that the Brief *Amici Curiae* of International Organization of Motor Vehicle Manufacturers, European Automobile Manufacturers' Association, and European Association of Automotive Suppliers in Support of Petitioners in the foregoing case contains 5,717 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 September 30, 2021.

/s/ Carter G. Phillips
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