

No. 21-312

In the Supreme Court of the United States

VOLKSWAGEN AKTIENGESELLSCHAFT, ET AL.,

Petitioners,

v.

OHIO EX REL. ATTORNEY GENERAL DAVE YOST,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF IN OPPOSITION contains 4,725 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 October 8, 2021.

/s/ Benjamin M. Flowers

BENJAMIN M. FLOWERS

Ohio Solicitor General

Counsel for Respondent