



CERTIFICATE OF COMPLIANCE

Nos. 21A243, 21A244, 21A245, 21A246, 21A247,
21A248, 21A249, and 21A250

IN RE: MCP NO. 165, OCCUPATIONAL SAFETY
AND HEALTH ADMINISTRATION, INTERIM
FINAL RULE: COVID-19 VACCINATION AND
TESTING; EMERGENCY TEMPORARY
STANDARD 86 FED. REG. 61402, ISSUED ON
NOVEMBER 4, 2021

As required by Supreme Court Rule 33.1(h), I certify that the Motion of 400 Physicians, Surgeons, Nurses, and Medical Professionals Opposing OSHA's Unconstitutional Overreach Leave to File Attached Brief as *Amicus Curiae* in Support of Applicants contains 441 and 2,497 words, excluding the parts of the Brief 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 January 6, 2022.

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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: January 6, 2022

John D. Gallagher

Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023