



**CERTIFICATE OF COMPLIANCE**

No. 22-1199

ROGAN O'HANDLEY,

*Petitioner,*

v.

SHIRLEY WEBER, IN HER OFFICIAL CAPACITY AS  
CALIFORNIA SECRETARY OF STATE, & TWITTER INC.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Motion for Leave to File Brief as Amici Curiae and Brief for the State of Montana and 8 Other States as Amici Curiae in Support of Petitioner contains 282 words and 4,961 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio  
County of Hamilton

I declare under penalty of perjury that the foregoing  
is true and correct.

Executed on August 25, 2023.



Emily Mullins  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

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

Date: August 25, 2023

John D. Gallagher  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2028