

No. 22-293

In The
Supreme Court of the United States

ANTHONY NOVAK,

Petitioner,

v.

CITY OF PARMA, OHIO, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Patrick Jaicomo, counsel of record for petitioner and a member of the Bar of this Court, certify that the Reply in Support of a Writ of Certiorari in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that the petition complies with the word limit of Supreme Court Rule 33.1(g). It contains 2,997 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

JANUARY 24, 2023

/s/ Patrick Jaicomo
PATRICK JAICOMO
INSTITUTE FOR JUSTICE
901 N. Glebe Rd., Ste. 900
Arlington, VA 22203
(703) 682-9320
pjaicomo@ij.org