

No. 22-978

**In the Supreme Court of the United States**

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JACKIE JACKSON,

*Petitioner,*

v.

OHIO,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the BRIEF IN OPPOSITION contains 4,279 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 July 10, 2023.

*/s/ Benjamin M. Flowers*

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BENJAMIN M. FLOWERS

Ohio Solicitor General

*Counsel for Respondent*