

No. 22O151

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

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STATE OF TEXAS

*Plaintiff,*

v.

COMMONWEALTH OF PENNSYLVANIA, STATE OF  
GEORGIA, STATE OF MICHIGAN, AND STATE OF  
WISCONSIN,

*Defendants.*

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CERTIFICATE OF COMPLIANCE

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As required by Supreme Court Rules 37.5 and 33.1(h), I certify that the MOTION FOR LEAVE TO FILE an *amicus* brief contains 279 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d), and the BRIEF OF *AMICUS CURIAE* STATE OF OHIO IN SUPPORT OF NEITHER PARTY contains 1,471 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 December 10, 2020.

*/s/ Benjamin M. Flowers*  
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BENJAMIN M. FLOWERS  
Ohio Solicitor General  
*Counsel for State of Ohio*