



CERTIFICATE OF COMPLIANCE

No. 23-156

SPEECH FIRST, INC.,

Petitioner,

v.

TIMOTHY SANDS, INDIVIDUALLY AND IN HIS OFFICIAL
CAPACITY AS PRESIDENT OF THE UNIVERSITY OF
VIRGINIA POLYTECHNIC INSTITUTE AND STATE
UNIVERSITY,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* the Buckeye Institute in Support of Petitioner contains 3,539 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 September 18, 2023.

Donna J. Moore

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

Date: September 18, 2023

John D. Gallagher
Notary Public

[seal]



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