



**CERTIFICATE OF COMPLIANCE**

No. 23-156

SPEECH FIRST, INC.,

*Petitioner,*

v.

TIMOTHY SANDS, in his individual capacity and  
official capacity as President of Virginia Polytechnic  
Institute and State University,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I  
certify that the Reply Brief for Petitioner contains  
2,952 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 October 26, 2023.



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

Date: 10-26-2023



Notary Public

[seal]



**DOUGLAS S. MOORE**  
Notary Public, State of Ohio  
My Commission Expires  
December 18, 2027