



**CERTIFICATE OF COMPLIANCE**

No. 23-62

MERRICK B. GARLAND, ATTORNEY GENERAL, ET AL.,  
*Petitioners,*

v.

SCOTT A. HARDIN,  
*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Respondent's Brief in Support of Certiorari contains 4,267 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 20, 2023.



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Cincinnati, OH 45249  
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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: September 20, 2023

John D. Gallagher  
Notary Public

[seal]



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