



CERTIFICATE OF COMPLIANCE

No. 23-862

WEST FLAGLER ASSOCIATES, LTD., *et al.*,
Petitioners,

v.

DEBRA HAALAND, *et al.*,
Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief of Petitioners contains 2,957 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 May 21, 2024.

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

Date: 5-21-2024

Douglas S. Moore
Notary Public

[seal]



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