

IN THE SUPREME COURT OF THE UNITED STATES

No. 25-607

MIAMI TOWNSHIP BOARD OF TRUSTEES,
Petitioner,
v.

ROGER DEAN GILLISPIE AND MATTHEW SCOTT MOORE,
Respondents.

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Brief of Amici Curiae Ohio Township Association, Coalition of Large Ohio Urban Townships, Ohio Municipal League, and County Commissioners Association of Ohio in Support of Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains 5,331 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 365) used to prepare the document.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 23, 2025.



Julia E. Donnan
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of Large Ohio Urban Townships, Ohio
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Commissioners Association of Ohio*