

No. 21-1454

In the Supreme Court of the United States

THE OHIO ADJUTANT GENERAL'S DEP'T, ET AL.,

Petitioners,

v.

FEDERAL LABOR RELATIONS AUTHORITY, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the REPLY BRIEF FOR PETITIONERS contains 5,988 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on December 22, 2022.

/s/ Benjamin M. Flowers

BENJAMIN M. FLOWERS

Ohio Solicitor General

Counsel for Petitioners