

No. 22-123

**In the Supreme Court of the United States**

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UNIVERSITY OF TOLEDO,

*Petitioner,*

v.

JAYCEE WAMER,

*Respondent.*

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CERTIFICATE OF COMPLIANCE

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As required by Supreme Court Rule 33.1(h), I certify that the REPLY IN SUPPORT OF PETITION FOR WRIT OF CERTIORARI contains 2,681 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 October 13, 2022.

*/s/ Benjamin M. Flowers*

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BENJAMIN M. FLOWERS

Ohio Solicitor General

*Counsel for Petitioner*