

No. 23-1039

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

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MARLEAN A. AMES,

*Petitioner,*

v.

OHIO DEPARTMENT OF YOUTH SERVICES,

*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 BRIEF IN OPPOSITION contains 8,930 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 May 31, 2024.

*/s/ Michael J. Hendershot*  
MICHAEL J. HENDERSHOT  
Ohio Chief Deputy Solicitor General

*Counsel for Respondent*