

In The
Supreme Court of the United States

MARLEAN A. AMES,
Petitioner,

v.

OHIO DEPARTMENT OF YOUTH SERVICES,
Respondent.

*On Writ of Certiorari
to the United States Court of Appeals
for the Sixth Circuit*

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I am a member of the Bar of the Supreme Court and I certify that the BRIEF OF PACIFIC LEGAL FOUNDATION AS AMICUS CURIAE IN SUPPORT OF PETITIONER contains 3,984 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

DATED: December 16, 2024.

s/ Jeffrey D. Jennings
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