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No. 17-1354

ERICK GELHAUS, Petitioner,

v.

ESTATE OF ANDY LOPEZ, by and through Successors in Interest, RODRIGO LOPEZ and SUJAY CRUZ, et al., Respondents.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the MOTION FOR LEAVE TO FILE AND AMICUS CURIAE BRIEF ON BEHALF OF THE CALIFORNIA STATE SHERIFFS' ASSOCIATION, THE CALIFORNIA POLICE CHIEFS ASSOCIATION AND THE CALIFORNIA PEACE OFFICERS' ASSOCIATION IN SUPPORT OF PETITIONER in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 5986 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 26th day of April, 2018. I am duly authorized under the laws of the State of Nebraska to administer oaths.

PATRICIA BILLOTTE
General Notary
State of Nebraska
My Commission Expires Nov 24, 2020

Tahriis C. Billotte

andraw H. Colle

Affiant