## Supreme Court of the United States

## COUNTY OF MAUI,

Petitioner,

v.

HAWAI'I WILDLIFE FUND; SIERRA CLUB — MAUI GROUP; SURFRIDER FOUNDATION; WEST MAUI PRESERVATION ASSOCIATION,

Respondents.

## CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Amicus Curiae Brief in case Docket No. 18-260 contains 5,806 words, excluding 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 the 28th day of September, 2018.

J.G. Andre Monette

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