## CERTIFICATE OF COMPLIANCE

No. 18-672

CITY OF NEWPORT BEACH, CALIFORNIA, et al.,

Petitioners,

v.

RICHARD VOS and JENELLE BERNACCHI,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition to Certiorari for Respondents contains 6,810 words, excluding the parts of the Brief in Opposition to Certiorari 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 March 8, 2018, in Hermosa Beach, California.

Paul L. Hoffman

Counsel of Record for Respondents.