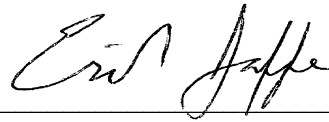


CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying Reply in Support of Petition for Writ of Certiorari in Rodriguez v City of San Jose, No. 19-1057, complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 2,986 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).

A handwritten signature in black ink, appearing to read "Erik S. Jaffe", is written above a horizontal line.

Erik S. Jaffe