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February 25, 2020

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE: NEAL N. BROWDER, CITY OF SAN DIEGO, AND SHELLEY ZIMMERMAN V. S.R. NEHAD, K.R. NEHAD, AND ESTATE OF FRIDOON RAWSHAN NEHAD

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari referenced above contains **6,941** words, excluding the 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.

Sincerely,

Jack Suber, Esq. Principal

LISA KAY NICHOLSON | Sworn and subscribed before me this 25th day of February 2020.

Sig K Michalson