

DONNA J. WOLF, J.D. JULIE A. KERSHNER, J.D.

## **CERTIFICATE OF COMPLIANCE**

No. 19-1067

## NEAL N. BROWDER, ET AL.,

Petitioners,

v.

## S. R. NEHAD, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amici Curiae California State Association of Counties and the League of California Cities in Support of Petitioners contains 4,957 words, excluding the parts of the Brief 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 27, 2020.

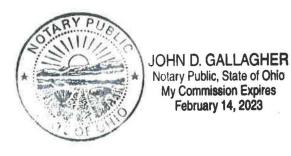
mar. Wel Donna J. Wolf

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BECKER GALLAGHER LEGAL PUBLISHING INCORPORATED (800) 890.5001 www.beckergallagher.com 8790 Governor's Hill Drive Suite 102 Cincinnati, Ohio 45249 Franklin Square 1300 | Street, NW, Suite 400E Washington, DC 20005 Sworn to and subscribed before me by said Affiant on the date designated below.

Date: March 27, 2020 John Durch Notary Public

[seal]



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