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July 20, 2020

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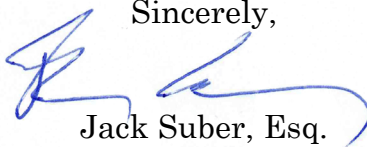
**RE 19-1067: NEAL N. BROWDER, CITY OF SAN DIEGO, AND SHELLEY ZIMMERMAN V.
S.R. NEHAD, K.R. NEHAD, AND ESTATE OF FRIDOOON RAWSHAN NEHAD**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Reply to Opposition to Petition for a Writ of Certiorari referenced above contains **2,998** 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



Sworn and subscribed before me this 20th day of July 2020.

