No. 19-1175

In the Supreme Court of the United States

JOHN AND MELISSA FRITZ,

Petitioners,

v.

WASHOE COUNTY, NEVADA,

Respondent.

On Petition for a Writ of Certiorari to the Nevada Supreme Court

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF PACIFIC LEGAL FOUNDATION IN SUPPORT OF PETITIONER contains 3,627 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.

Executed on April 24, 2020.

BRIAN T. HODGES Counsel of Record Pacific Legal Foundation 930 G Street Sacramento, California 95814 Telephone: (425) 576-0484 BHodges@pacificlegal.org

Counsel for Amicus Curiae