

No. 19-1199

In the
Supreme Court of the United States

Don Higginson,

Petitioner,

v.

XAVIER BECERRA, in his official capacity as the
Attorney General of California; CITY OF POWAY,

Respondents.

**On Petition for a Writ of Certiorari to
the United States Court of Appeals
for the Ninth Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF PACIFIC LEGAL FOUNDATION et al. IN SUPPORT OF PETITIONER contains 5,786 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 May 5, 2020.



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