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No. 19-1199

DON HIGGINSON,  
Petitioner,

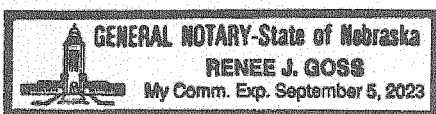
v.

XAVIER BECERRA, in his official capacity as the  
Attorney General of California; City of Poway,  
Respondents.

### CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF THE CITIES OF MISSION VIEJO, OROVILLE, SOLANA BEACH, SOUTH PASADENA, AND BARSTOW, AND THE TOWN OF YUCCA VALLEY, CALIFORNIA, IN SUPPORT OF PETITIONER in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 5883 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 6th day of May, 2020.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Renee J. Goss*  
\_\_\_\_\_  
Notary Public

*Andrew H. Cockle*  
\_\_\_\_\_  
Affiant