

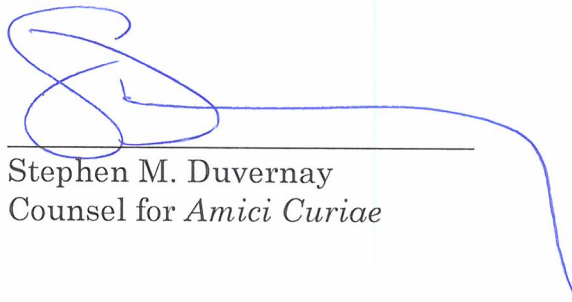
CERTIFICATE OF COMPLIANCE

No. 19-1199, *Higginson v. Becerra*

As required by Supreme Court Rule 33.1(h), I certify that the brief for *amici curiae* Current and Former California Local Elected Officials contains 4,773 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 May 6, 2020



Stephen M. Duvernay
Counsel for *Amici Curiae*