No. 19-251

Americans for Prosperity Foundation v. Xavier Becerra, Attorney General of California

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 4,935 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 February 24, 2021.

JEREMY TALCOTT