

DONNA J. WOLF, J.D. JULIE A. KERSHNER, J.D.

CERTIFICATE OF COMPLIANCE

No. 19-357

CITY OF CHICAGO, ILLINOIS,

Petitioner,

v.

ROBBIN L. FULTON, et al.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* National Association of Counties, National League of Cities, United States Conference of Mayors, International City/County Management Association, International Municipal Lawyers' Association, and Government Finance Officers Association, in Support of Petitioner contains 3,599 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 February 10, 2020.

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BECKER GALLAGHER LEGAL PUBLISHING INCORPORATED (800) 890.5001 www.beckergallagher.com 8790 Governor's Hill Drive Suite 102 Cincinnati, Ohio 45249 Franklin Square 1300 I Street, NW, Suite 400E Washington, DC 20005 Sworn to and subscribed before me by said Affiant on the date designated below.

Date: $\int leg 10 7.7.$ Notary Public [seal]

