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October 31, 2019

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE NO. 19-439: CTIA - THE WIRELESS ASSOCIATION V. THE CITY OF BERKELEY,

CALIFORNIA, AND CHRISTINE DANIEL, CITY MANAGER OF

BERKELEY, CALIFORNIA, IN HER OFFICIAL CAPACITY

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Association of National Advertisers, Inc. in Support of Petitioner referenced above contains **5,886** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Arthur D. Chotin, Esq.

Principal