

No. 19-670

Arnold Fleck v. Joe Wetch et al.,

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the **Brief Amicus Curiae of Pacific Legal Foundation, Cato Institute and Atlantic Legal Foundation In Support of Petitioner** contains 3,581 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 December 19, 2019.



DEBORAH J. LAFETRA

Counsel of Record

Pacific Legal Foundation

930 G Street

Sacramento, California 95814

Telephone: (916) 419-7111

E-mail: DLaFetra@pacificlegal.org

*Counsel for Amicus Curiae of
Pacific Legal Foundation*