Nos. 19-675 & 19-688

BANK OF AMERICA CORP., ET AL., *Petitioners*,

v.

CITY OF MIAMI, FLORIDA, Respondent.

Wells Fargo & Co. and Wells Fargo Bank, N.A., Petitioners,

v.

CITY OF MIAMI, FLORIDA, Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief for the Cato Institute as *Amicus Curiae* Supporting Petitioners contains 5,298 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

<u>/s/ Ilya Shapiro</u> Counsel of Record