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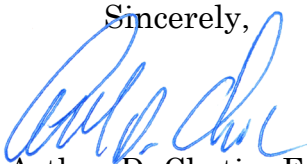
**RE: NO. 19A230: WILLIAM P. BARR, ATTORNEY GENERAL, *ET AL.* V. EAST BAY
SANCTUARY COVENANT, *ET AL.***

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Non-Profit Organizations and Law School Clinics as *Amici Curiae* in Support of Respondents referenced above contains **1,927** 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