

## CERTIFICATE OF COMPLIANCE

No. \_\_\_\_\_

SARA DEES,

*Petitioner,*

v.

COUNTY OF SAN DIEGO,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari contains 4,483 words, excluding the parts of the Petition for Writ of Certiorari 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 January 13, 2021.

/s/ *Donnie R. Cox*  
Donnie R. Cox  
Counsel of Record for  
Petitioner, Sara Dees