In The Supreme Court of the United States

CEDAR POINT NURSERY and FOWLER PACKING COMPANY, INC.,

Petitioners,

v.

VICTORIA HASSID, in her official capacity as Chair of the Agricultural Labor Relations Board, et al., Respondents.

On Petition for Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

CERTIFICATE OF COMPLIANCE

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As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE Of AMERICAN FARM BUREAU FEDERATION IN SUPPORT OF PETITIONERS contains 4,051 words, excluding the parts of the document that are exempted by Rule 33.1(d).

DATED: September 2020

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