

No. 20-1212

PEYMAN PAKDEL, et ux., Petitioners,

v.

CITY AND COUNTY OF SAN FRANCISCO, CALIFORNIA, et al., Respondents

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF THE PELICAN INSTITUTE FOR PUBLIC POLICY IN SUPPORT OF PETITIONERS in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12-point font for the text and 10-point font for the footnotes, and this brief contains 2,477 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 1st day of April, 2021.

Notary Public

MEDLOCK MARK HARBISON

Notary Public, Bar No. 34410 State of Louisiana My Commission is for Life

Affiant