

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 Brief of the Cato Institute as *Amicus Curiae* in Support of Petitioners contains 3,473 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro
Counsel of Record