



CERTIFICATE OF COMPLIANCE

No. 20-1376

MICHAEL ABATTI AND MIKE ABATTI FARMS, LCC,
Petitioners,

v.

IMPERIAL IRRIGATION DISTRICT,
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief for California Farm Bureau, Imperial County Farm Bureau, Imperial Valley Water, Don Barioni, Jr., Howard Elmore, Richard Elmore, Mike Morgan, and Doug Westmoreland, as *Amici Curiae* in Supporting of Petitioners contains 4,470 words, excluding the parts of the Brief 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 April 23, 2021.

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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: April 23, 2021

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023