No. 20-1541

PIVOTAL SOFTWARE, INC., ET AL.,

Petitioners,

V.

SUPERIOR COURT OF CALIFORNIA
CITY AND COUNTY OF SAN FRANCISCO, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE WITH THE WORD LIMITATIONS

I, Anthony G. Lantagne, hereby certify that the above referenced BRIEF OF AMICUS CURIAE WASHINGTON LEGAL FOUNDATION IN SUPPORT OF PETITIONERS, as indicated by the word count feature of MS Word, and including footnotes but excluding those parts enumerated for exclusion under the rules, contains 3,304 words.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 23rd day of August, 2021.

Anthony G. Lantagne Lantagne Legal Printing, Inc. 801 E. Main Street, Suite 100 Richmond, Virginia 23219 (804) 644-0477

COMMONWEALTH OF VIRGINIA CITY OF RICHMOND)	
)	to-wit:

Anthony G. Lantagne appeared before me this 23rd day of August, 2021, and attested that the foregoing certificate is true and exact to the best of his knowledge and belief.

Kejona Redd