



CERTIFICATE OF COMPLIANCE

No. 20-161

CITY OF SACRAMENTO, SACRAMENTO POLICE
DEPARTMENT, SAMUEL D. SOMERS, JOHN C. TENNIS,
AND RANDY R. LOZOYA,

Petitioners,

v.

ROBERT MANN, SR., VERN MURPHY-MANN, AND
DEBORAH MANN,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioners contains 2,886 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 September 25, 2020.

Donna J. Wolf
Becker Gallagher Legal Publishing, Inc.
8790 Governor's Hill Drive, Suite 102
Cincinnati, OH 45249
(800) 890-5001

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

Date: September 25, 2020

John N. Gallagher
Notary Public

[seal]



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