



**CERTIFICATE OF COMPLIANCE**

No. 20-1768

RON FENN,

*Petitioner,*

v.

CITY OF TRUTH OR CONSEQUENCES, MICHAEL  
APODACA, POLICE CHIEF LEE ALIREZ, AND  
DANIEL HICKS,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition contains 5,017 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 August 13, 2021.

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

Date: August 13, 2021

John D. Gallagher  
Notary Public

[seal]



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