

CERTIFICATE OF COMPLIANCE

No. 20-1775

THE STATE OF ARIZONA, ET AL.,

Petitioners,

v.

CITY AND COUNTY OF SAN FRANCISCO, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Petitioners contains 10,568 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 December 13, 2021.

Emily Mullins

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:

La la tra

Notary Public

[seal]



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