

No. 20-1775

In the Supreme Court of the United States

STATE OF ARIZONA, *ET AL.*,

Petitioners,

v.

CITY AND COUNTY OF SAN FRANCISCO,

ET AL.,

Respondents.

**On Writ of *Certiorari* to the
United States Court of Appeals
for the Ninth Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the accompanying *amicus curiae* brief of Immigration Reform Law Institute in the above-captioned matter contains 5,438 words, excluding the parts of the document 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 20, 2021.

/s/ Lawrence J. Joseph

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