

NO. _____

IN THE

Supreme Court of the United States

CITY OF MIAMI GARDENS,

Petitioner,

v.

WELLS FARGO & CO.,

AND

WELLS FARGO BANK, NA,

Respondents.

**On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Eleventh Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 8.982 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 September 24, 2020.

s/ Robert S. Peck

Robert S. Peck
Center for Constitutional Litigation, PC