



CERTIFICATE OF COMPLIANCE

No. 20-405

CITY OF MIAMI GARDENS, FLORIDA,

Petitioner,

v.


WELLS FARGO & CO., ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Motion for Leave to File and *Amicus Curiae* Brief for the International Municipal Lawyers Association in Support of Petitioner contains 105 and 2,375 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 October 29, 2020.



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

Date: October 29, 2020

John B. Bueh

Notary Public

[seal]



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