

NO. 20-405

---

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 2,819 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 11, 2020.

s/ Robert S. Peck

Robert S. Peck  
Center for Constitutional Litigation, PC