## In the Supreme Court of the United States

BRIDGE AINA LE'A, LLC,

Petitioner,

v.

STATE OF HAWAII LAND USE COMMISSION.

Respondent.

On Petition for 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 BRIEF AMICUS CURIAE OF PACIFIC LEGAL FOUNDATION, CATO INSTITUTE, NEW ENGLAND LEGAL FOUNDATION, PROF. FRANK SCHNIDMAN, AND DAVID COLLINS, ESQ., IN SUPPORT OF PETITIONER contains 6,000 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 Aug. 20, 2020.

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