SUPREME COURT OF THE UNITED STATES No. 20-54

BRIDGE AINA LE'A, LLC,

Petitioner,

v.

STATE OF HAWAII LAND USE COMMISSION,

Respondent,

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF \mathbf{OF} AMICI CURIAE OWNERS' COUNSEL OF AMERICA. NATIONAL ASSOCIATION OF REVERSIONARY PROPERTY OWNERS, NFIB SMALL BUSINESS LEGAL CENTER, REASON FOUNDATION, AND PROFESSOR SHELLEY ROSS SAXER was typeset using Century Schoolbook (12-point for the text and 10-point for the footnotes) and contains 4,536 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 August 21, 2020

Counsel of Record for Amici Curiae