No. 20-605

## IN THE Supreme Court of the United States

KIERNAN WHOLEAN, ET AL.,

Petitioners,

v.

CSEA SEIU LOCAL 2001, ET AL.,

Respondents.

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 In Opposition of Respondent CSEA SEIU LOCAL 2001 in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point type for the text and 10 point for the footnotes, and that the brief complies with the word limit specified by Rule 33.1(g)(ii) because it contains 4,345 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Dated: February 22, 2021

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