

IN THE SUPREME COURT
OF THE UNITED STATES

No. 20-787

Preserve Responsible Shoreline Management, et al.

Petitioners,

v.

City of Bainbridge Island, et al.

Respondents.

Certificate of Compliance With
Word Limitation

In accordance with Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of the Atlantic Legal Foundation as *Amicus Curiae* in Support of Petitioners complies with the applicable word limit set forth in Rule 33.1(g): Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains 4,639 words. (Consistent with Rule 33.1(d), the undersigned is relying on the word count utility in Microsoft Word (Microsoft 365), the word processing program used to prepare the brief.)

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