

CERTIFICATE OF COMPLIANCE

No. 20-989

CITY OF NEWARK,

Petitioner,

v.

FRATERNAL ORDER OF POLICE NEWARK LODGE NO.
12,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* City of Jersey City in Support of Petitioner contains 4,380 words, excluding the parts of the Brief 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 February 25, 2021.



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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: Feb 25, 2021

John D. Gallagher

Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023