



CERTIFICATE OF COMPLIANCE

No. 20-994

VOLKSWAGEN GROUP OF AMERICA, INC., ET AL.,

*Petitioners,*

v.

ENVIRONMENTAL PROTECTION COMMISSION OF  
HILLSBOROUGH COUNTY, FLORIDA, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the *Amici Curiae* Brief of Former Environmental Protection Agency, California Air Resources Board, and Department of Justice Officials Jeffrey E. Holmstead, Ronald J. Tenpas, John B. Dunlap III, and Lynn Buhl in Support of Petitioners contains 4,489 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 16, 2021.

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

Date: February 16, 2021

John D. Gallagher  
Notary Public

[seal]



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