

No. 20-994

**In the Supreme Court of the United States**

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

*v.*

THE ENVIRONMENTAL PROTECTION COMMISSION OF HILLSBOROUGH COUNTY, FLORIDA,  
AND SALT LAKE COUNTY, UTAH

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the foregoing brief contains 5,994 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury the foregoing is true and correct. Executed on February 17, 2021.

/s Elisabeth S. Theodore

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