



**CERTIFICATE OF COMPLIANCE**

No. \_\_\_\_\_

THE ERISA INDUSTRY COMMITTEE,

*Petitioner,*

v.

CITY OF SEATTLE,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 8,987 words, excluding the parts of the Petition 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 January 14, 2022.

Emily Mullins  
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(800) 890-5001

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

Date: July 14, 2022  
John D. Gallagher  
Notary Public

[seal]



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