In the Supreme Court of the United States

THE ERISA INDUSTRY COMMITTEE,

Petitioner,

v.

CITY OF SEATTLE,

Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition contains 8,957 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 April 25, 2022.

Matthew Gerend

KELLER ROHRBACK L.L.P.

1201 Third Ave., Suite 3200 Seattle, WA 98101

(206) 623-1900

mgerend@kellerrohrback.com