



CERTIFICATE OF COMPLIANCE

No. 21-1598

CITY OF ANAHEIM, CA, ET AL.,

Petitioners,

v.

FERMIN VINCENT VALENZUELA, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* International Municipal Lawyers Association and League of California Cities in Support of Petitioners contains 4,286 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 July 28, 2022.

Donna J. Wolf
Becker Gallagher Legal Publishing, Inc.
8790 Governor's Hill Drive, Suite 102
Cincinnati, OH 45249
(800) 890-5001

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

Date: July 28, 2022

John D. Gallagher

Notary Public

[seal]



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