



CERTIFICATE OF COMPLIANCE

No. 21-414

FIRST MIDWEST BANK, guardian of the estate of
Michael D. LaPorta, a disabled person,
Petitioner,

v.

CITY OF CHICAGO,
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the Rutherford Institute and Cato Institute as Amici Curiae in Support of Petitioner contains 2,945 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 October 7, 2021.

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

Date: October 7, 2021

John D. Gallagher
Notary Public

[seal]



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