



CERTIFICATE OF COMPLIANCE

No. 21-499

CARLOS VEGA,

Petitioner,

v.

TERENCE B. TEKOH,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief for *Amici Curiae* International Municipal Lawyers Association and California State Association of Counties in Support of Petitioner contains 4,829 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 November 3, 2021.

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

Date: November 3, 2021

John D. Gallagher
Notary Public

[seal]



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