

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

As required by Supreme Court Rule 33.1(h), I certify that the accompanying Brief of the Cato Institute, National Association of Reversionary Property Owners, Reason Foundation, Southeastern Legal Foundation, and Property Law Professors Shelley Ross Saxer and James W. Ely, Jr., as *Amici Curiae*, complies with the word limitations of Rule 33.1(g), and that it contains 3,566 words, excluding the parts of the document that are exempted by Rule 33.1(d).

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