



**CERTIFICATE OF COMPLIANCE**

No. 21-788

APARTMENT ASSOCIATION OF LOS ANGELES COUNTY,  
INC., DBA APARTMENT ASSOCIATION OF  
GREATER LOS ANGELES,

*Petitioner,*

v.

CITY OF LOS ANGELES & ALLIANCE OF CALIFORNIANS  
FOR COMMUNITY EMPOWERMENT AND STRATEGIC  
ACTIONS FOR A JUST ECONOMY,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Consolidated Reply Brief of Petitioner contains 2,496 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 March 24, 2022.

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

Date: March 24, 2022

John D. Gallagher

Notary Public

[seal]



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