

IN THE
Supreme Court of the United States

GEORGE SHEETZ,
Petitioner,

v.

COUNTY OF EL DORADO, CALIFORNIA,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF CITIZEN ACTION DEFENSE FUND, WASHINGTON BUSINESS PROPERTIES ASSOCIATION, AND SOUNDBUILT HOMES, LLC, AS *AMICI CURIAE* IN SUPPORT OF PETITIONERS in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains **6,965** words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

November 20, 2023

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