

CERTIFICATE OF COMPLIANCE

No. 22-1074

GEORGE SHEETZ,

Petitioner,

v.

COUNTY OF EL DORADO, CALIFORNIA,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Bay Area Council in Support of Petitioner contains 3,041 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio County of Hamilton

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 20, 2023.

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

Date: Normbu 20, 2023 **Notary Public**

[seal]

JOHN D. GALLAGHER Notary Public, State of Ohio My Commission Expires February 14, 2028