



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 the American Planning Association as *Amicus Curiae* in Support of Neither Party contains 5,972 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.

Donna J. Moore

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

Date: November 20, 2023

John D. Gallagher

Notary Public

[seal]



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