In The Supreme Court of the United States

GEORGE SHEETZ,

Petitioner,

v.

COUNTY OF EL DORADO, CALIFORNIA,

Respondent.

On Writ of Certiorari to the Court of Appeal of California, Third Appellate District

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF AMICI CALIFORNIA STATE ASSOCIATION OF COUNTIES ET AL. IN SUPPORT OF RESPONDENT in the above-entitled case complies with the typeface requirements of Supreme Court Rule 33.1(b), and contains 7,732 words, excluding the parts of the document 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 December 14, 2023

 $\begin{array}{c} \textbf{Andrew W. Schwartz} \\ \textbf{\textit{Counsel of Record}} \end{array}$

SHUTE, MIHALY & WEINBERGER LLP

Counsel for Amici