

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 For Amici Curiae City And County Of San Francisco, Local Government Legal Center, National Association Of Counties, National League Of Cities, International Municipal Lawyers Association, And Government Finance Officers Association In Support Of Respondent contains 7,875 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 December 19, 2023.

Julie A. Connor

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

Date: December 19, 2023

Notary Public

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DONNA JO MOORE Notary Public, State of Ohio My Commission Expires November 27, 2027