

No. 22-1218

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IN THE  
**Supreme Court of the United States**

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WENDY SMITH, ET AL.,

*Petitioners,*

v.

KEITH SPIZZIRRI, ET AL.,

*Respondents.*

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**On Writ of Certiorari to the United States  
Court of Appeals for the Ninth Circuit**

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**CERTIFICATE OF COMPLIANCE**

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Pursuant to Supreme Court Rule 33.1(h), I hereby certify that the Amicus Curiae Brief of the American Association for Justice in Support of Respondents contains 7,500 words, excluding the parts of the document exempted by Supreme Court Rule 33.1(d).

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

Executed this 4th day of March 2024.

/s/ Jeffrey R. White

Jeffrey R. White  
*Attorney for Amicus Curiae*