

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 22-699

COUNCIL FOR EDUCATION AND RESEARCH ON TOXICS,

Petitioner,

v.

CALIFORNIA CHAMBER OF COMMERCE,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Raphael Metzger, certify that the Reply Brief in the foregoing case contains 2,993 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
March 29, 2023.

/s/ Raphael Metzger

RAPHAEL METZGER

Counsel for Petitioner