## CERTIFICATE OF WORD COUNT

No. 22-739

David Kagan, et al.,

Petitioners,

v.

City of Los Angeles, California, et al.,

Respondents.

STATE OF MASSACHUSETTS )
COUNTY OF NORFOLK ) SS.:

Being duly sworn, I depose and say:

- 1. That I am over the age of 18 years and am not a party to this action. I am an employee of the Supreme Court Press, the preparer of the document, with mailing address at 1089 Commonwealth Avenue, Suite 283, Boston, MA 02215.
- 2. That, as required by Supreme Court Rule 33.1(h), I certify that the *San Francisco Apartment Association California Apartment Association et al. Amicus Brief* contains 3027 words, including the parts of the brief that are required or exempted by Supreme Court Rule 33.1(d).

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

Lucas DeDeus

March 8, 2023