No. 23-175

In The Supreme Court of the United States

CITY OF GRANTS PASS, OREGON,

Petitioner,

v. GLORIA JOHNSON, *ET AL*.,

Respondents.

CERTIFICATE OF WORD COUNT

I hereby certify on this 4th day of March, 2024, that excluding those parts allowed by rule, the above referenced BRIEF OF SAN BERNARDINO COUNTY, CALIFORNIA AS $AMICUS\ CURIAE$ IN SUPPORT OF PETITIONER contains 4,493 words.

Respectfully submitted,

/s/ Cale Jaffe Counsel of Record ENVIRONMENTAL LAW AND

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