



CERTIFICATE OF COMPLIANCE

No. 23-270

COUNTY OF TULARE, ET AL.,

*Petitioners,*

v.

JOSE MURGUIA, FOR HIMSELF AND FOR THE ESTATES  
OF MASON AND MADDOX MURGUIA, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of International Municipal Lawyers Association, National Association of Counties, California State Association of Counties, and League of California Cities as *Amici Curiae* in Support of Petitioners contains 4,444 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 October 20, 2023.



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Emily Mullins  
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Cincinnati, OH 45249  
(800) 890-5001

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

Date: October 20, 2023

John D. Gallagher  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2028