

## **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).

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

Executed on October 20, 2023.

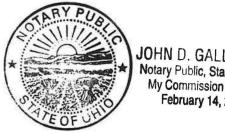
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**Emily Mullins** Becker Gallagher Legal Publishing, Inc. 8790 Governor's Hill Drive, Suite 102 Cincinnati, OH 45249 (800) 890-5001

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

Date: October 20, 2023 John Buch Notary Public

[seal]



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