IN THE SUPREME COURT OF THE UNITED STATES

EL PAPEL, LLC, AND BERMAN 2, LLC,
PETITIONERS,

V.

THE CITY OF SEATTLE, WASHINGTON, AND BRUCE HARRELL, IN HIS OFFICIAL CAPACITY AS MAYOR OF THE CITY OF SEATTLE, RESPONDENTS.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Amicus Curiae Brief Of The Small Property Owners of San Francisco Institute Supporting Petitioners, contains 4,933 words, including footnotes, but 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 Feb. 6, 2024, at Los Angeles California.

<u>s/Michael M. Berger</u> Manatt, Phelps & Phillips, LLP 2049 Century Park East, Suite 1700 Los Angeles, CA 90067