



CERTIFICATE OF COMPLIANCE

No. 23-807

EL PAPEL, LLC, ET AL.,

Petitioners,

v.

CITY OF SEATTLE, WASHINGTON, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Apartment Association of Greater Los Angeles, California Rental Housing Association, and GHP Management Corporation in Support of Petitioners contains 4,491 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 February 14, 2024.

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

Date: February 14, 2024
John D. Gallagher
Notary Public

[seal]



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