IN THE Supreme Court of the United States

NO ON E, SAN FRANCISCANS OPPOSING THE AFFORDABLE CARE HOUSING PRODUCTION ACT, ET AL., Petitioners,

v.

DAVID CHIU, IN HIS OFFICIAL CAPACITY AS SAN FRANCISCO CITY ATTORNEY, ET AL., Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the **BRIEF OF CITIZEN ACTION DEFENSE FUND AS** *AMICUS CURIAE* IN SUPPORT OF PETITIONERS in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains **3,781** words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

March 26, 2024

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