IN THE SUPREME COURT OF THE UNITED STATES

GENE GONZALES AND SUSAN GONZALES, HORWATH FAMILY TWO, LLC, AND THE WASHINGTON LANDLORD ASSN.,

PETITIONERS,

V.

GOVERNOR JAY INSLEE AND STATE OF WASHINGTON, 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 and Owners Counsel of America Supporting Petitioners, contains 5,071 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 April 11, 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