

No.

In the Supreme Court of the United States

PATRICIA ITEN, PERSONAL REPRESENTATIVE
OF THE ESTATE OF HOWARD ITEN,

Petitioner,

v.

COUNTY OF LOS ANGELES,

Respondent.

*On Petition For A Writ Of Certiorari
To The United States Court Of Appeals
For The Ninth Circuit*

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the PETITION FOR WRIT OF CERTIORARI contains 5,435 words, 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 May 2, 2025.



KATHRYN D. VALOIS
Counsel of Record
Pacific Legal Foundation
4440 PGA Blvd., Suite 307
Palm Beach Gardens, FL 33410
Telephone: (561) 691-5000
kvalois@pacificlegal.org
Counsel for Petitioner