2311 Douglas Street Omaha, Nebraska 68102-1214 COCKLE Legal Briefs Est. 1923

E-Mail Address: contact@cocklelegalbriefs.com

Web Site www.cocklelegalbriefs.com

1-800-225-6964 (402) 342-2831 Fax: (402) 342-4850

No. 17-1354

ERICK GELHAUS, Petitioner,

v.

ESTATE OF ANDY LOPEZ, by and through successors in interest, Rodrigo Lopez and Sujay Cruz, et al., Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the MOTION FOR LEAVE TO FILE AND BRIEF OF THE INTERNATIONAL MUNICIPAL LAWYERS ASSOCIATION AND THE CALIFORNIA STATE ASSOCIATION OF COUNTIES AS AMICI CURIAE IN SUPPORT OF PETITIONER in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 5509 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 26th day of April, 2018. I am duly authorized under the laws of the State of Nebraska to administer oaths.

PATRICIA BILLOTTE

General Notary

State of Nebraska

My Commission Expires Nov 24, 2020

Notary Public

6. Billotte Ondraw H. Colle

36193