



CERTIFICATE OF COMPLIANCE

No. 18-672

CITY OF NEWPORT BEACH, CALIFORNIA, *et al.*,
Petitioners,

v.

RICHARD VOS, *et al.*,
Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* California State Association of Counties, The League of California Cities, and International Municipal Lawyer's Association in Support of Petitioners contains 5,522 words, excluding the parts of the Brief 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 December 20, 2018.

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

Date: December 30, 2018

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023