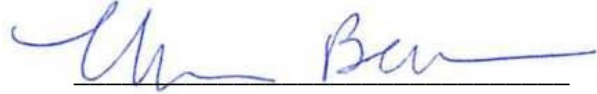


CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Nicole Berner, hereby certify that I am a member in good standing of the Bar of this Court and that the Brief for Amici Curiae Service Employees International Union, et al., in Support of Petitioners in No. 19-840, California, et al. v. Texas, et al., and Cross-Respondents in No. 19-1019, Texas, et al. v. California, et al., contains 7,129 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).



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