

No. 20-107

Cedar Point Nursery, *et al.*,

Petitioners

v.

Victoria Hassid, *et al.*,

CERTIFICATE OF COMPLIANCE

In compliance with this Court's Rule 33.1(h), I hereby certify that the *Amicus Curiae* Brief in the above-captioned case complies with the typeface requirements of Supreme Court Rule 33.1(b) because it is prepared in Century Schoolbook font, size 12 point for the text and 10 point for the footnotes, and that this brief contains 2,945 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

Executed this 2nd day of September, 2020.

/s/ Jeffrey Redfern

Jeffrey Redfern

Counsel for Petitioners