
In the Supreme Court of the United States

CEDAR POINT NURSERY AND FOWLER PACKING COMPANY, INC., *Petitioners*,

v.

VICTORIA HASSID, IN HER OFFICIAL CAPACITY AS CHAIR OF THE CALIFORNIA
AGRICULTURAL LABOR RELATIONS BOARD, ET AL., *Respondents*.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF LEGAL HISTORIANS AS *AMICI CURIAE* IN SUPPORT OF RESPONDENTS contains 7,976 words, respectively, 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 February 12, 2021.

Respectfully submitted,

/s/ Katharine M. Mapes

Katharine M. Mapes

*Counsel of Record for Amici Curiae
Legal Historians*