In the Supreme Court of the United States

Cedar Point Nursery and Fowler Packing Co.,

Petitioners.

v.

Victoria Hassid, in her official capacity as Chair of the California Agricultural Labor Relations Board, et al.,

Respondents.

On Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the American Federation of Labor and Congress of Industrial Organizations as *Amicus Curiae* in Support of Respondents was prepared using Century 12-point typeface and contains 6,332 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). This certificate was prepared in reliance on the word count function of the word-processing system used to prepare the document. I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

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Executed on February 12, 2021