


CERTIFICATE OF WORD COUNT

Pursuant to Supreme Court Rule 33.1(h), the undersigned hereby certifies that the Brief for United Farm Workers of America as *Amicus Curiae* in Support of Respondents complies with word limitations under Supreme Court Rule 33.1(g)(xii) as this brief contains 7043 words, including footnote text, but excluding the parts of the brief exempted under Supreme Court Rule 33.1(d) (question presented, table of contents, table of authorities, and the listing of counsel at the end of the brief).

February 12, 2021

Respectfully submitted,



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