

In the  
**Supreme Court of the United States**

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FRED J. EYCHANER,

*Petitioner,*

v.

CITY OF CHICAGO,

*Respondent.*

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On Petition for Writ of Certiorari  
to the Appellate Court of Illinois

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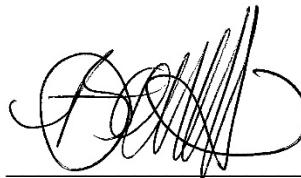
**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF PACIFIC LEGAL FOUNDATION AND NATIONAL FEDERATION OF INDEPENDENT BUSINESS SMALL BUSINESS LEGAL CENTER IN SUPPORT OF PETITIONER FRED J. EYCHANER contains 5,761 words, 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 April 12, 2021.



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