

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 20-

NORTH AMERICAN MEAT INSTITUTE,

*Petitioner,*

v.

XAVIER BECERRA, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I, Paul J. Zidlicky, certify that the Petition for a Writ of Certiorari in the foregoing case contains 8,974 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 February 26, 2021.

/s/ Paul J. Zidlicky  
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