

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 20-1215

North American Meat Institute,

Petitioner,

v.

Rob Bonta, et al.,

Respondents.

As required by Supreme Court Rule 33.1(h), I, Paul J. Zidlicky, certify that the Reply Brief For Petitioner in the foregoing case contains 2,983 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 June 7, 2021.

/s/ Paul J. Zidlicky
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