

No. 20-1541

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

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PIVOTAL SOFTWARE, INC., et al., PETITIONERS,

*v.*

SUPERIOR COURT OF CALIFORNIA,  
CITY AND COUNTY OF SAN FRANCISCO, et al.

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On Writ of Certiorari to the Court of Appeal for  
the State of California, First Appellate District

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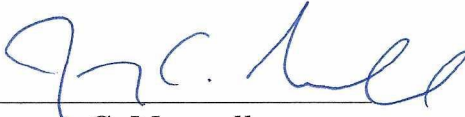
**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I hereby certify that the “Brief of the Society for Corporate Governance as *Amicus Curiae* in Support of Petitioners” filed in the above-captioned matter contains 3,936 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 August 23, 2021.

  
\_\_\_\_\_  
Jeremy C. Marwell  
Counsel for *Amicus Curiae*