

IN THE
Supreme Court of the United States

THE ERISA INDUSTRY COMMITTEE,
Petitioner,

v.

CITY OF SEATTLE,
Respondent.

**On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Ninth Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Meaghan VerGow, a member of the bar of this Court, certify on this 18th day of February, 2022, that the Brief of the Chamber of Commerce of the United States of America, Business Roundtable, and the National Association of Manufacturers as *Amici Curiae* in Support of Petitioner in the above-captioned case contains 4,149 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

/s/ Meaghan VerGow _____

Meaghan VerGow
