

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

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CITY OF ANAHEIM, CA, et al.,  
*Petitioners,*


v.  
FERMIN VINCENT VALENZUELA, et al.,  
*Respondents.*

————— ◆ —————  
**On Petition For A Writ Of Certiorari  
To The United States Court Of Appeals  
For The Ninth Circuit**

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Association of Southern California Defense Counsel in Support of Petitioners contains 2,766 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 July 28, 2022.

  
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Christopher D. Hu