

**Certificate of Compliance**

No. 21-1598

In The  
**SUPREME COURT OF THE UNITED STATES**

CITY OF ANAHEIM, CALIFORNIA, ET AL.,

Petitioners,

v.

FERMIN VINCENT VALENZUELA, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition of Respondents Fermin Vincent Valenzuela, et al., contains 8,915 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 26, 2022.

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