

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 22-720

DAKOTA FINANCE LLC, D/B/A ARABELLA FARM;
KEN SMITH; SHARON SMITH; WILLARED R. LAMNECK, JR.,

Petitioners,

v.

NATURALAND TRUST; SOUTH CAROLINA TROUT UNLIMITED;
UPSTATE FOREVER,

Respondents.

As required by Supreme Court Rule 33.1(h), I, Gordon D. Todd, certify that the brief of *amici curiae* Trade Organizations in support of Petitioners in the foregoing case contains 5,396 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 March 3, 2023.

/s/ Gordon D. Todd
GORDON D. TODD
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