CERTIFICATE OF WORD COUNT

No. 24-435

GHP Management Corporation et al.,

Petitioners,

v.

City of Los Angeles et al.,

Respondents.

STATE OF MASSACHUSETTS)
COUNTY OF NORFOLK) SS.:

Being duly sworn, I depose and say:

- 1. That I am over the age of 18 years and am not a party to this action. I am an employee of the Supreme Court Press, the preparer of the document, with mailing address at 1089 Commonwealth Avenue, Suite 283, Boston, MA 02215.
- 2. That, as required by Supreme Court Rule 33.1(h), I certify that the THE BUCKEYE INSTITUTE / MANHATTAN INSTITUTE AMICI BRIEF contains 4238 words, including the parts of the brief that are required or exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Lucas DeDeus

November 18, 2024