## RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 24-

FANE LOZMAN,

Petitioner,

v.

CITY OF RIVIERA BEACH, FLORIDA,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Tobias S. Loss-Eaton, certify that the Petition for a Writ of Certiorari in the foregoing case contains 7,050 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 February 20, 2025.

/s/ Tobias S. Loss-Eaton TOBIAS S. LOSS-EATON SIDLEY AUSTIN LLP 1501 K Street, N.W. Washington, D.C. 20005 (202) 736-8291 tlosseaton@sidley.com