

No. \_\_\_\_\_

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

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CARLOS PENA,

*Petitioner,*

v.

CITY OF LOS ANGELES,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I, Jeffrey Redfern, counsel of record for petitioner and a member of the Bar of this Court, certify that the Petition for a Writ of Certiorari in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that the petition complies with the word limit of Supreme Court Rule 33.1(g). It contains 7,837 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

Dated: April 6, 2026

/s/ Jeffrey Redfern

JEFFREY REDFERN

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