

No. 25-1163

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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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*On Petition For A Writ Of Certiorari To The  
United States Court of Appeals For the Ninth Circuit*

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF PACIFIC LEGAL FOUNDATION IN SUPPORT OF PETITIONER contains 3,264 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 May 8, 2026.

*s/ Wesley P. Hottot* \_\_\_\_\_

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