

IN THE
Supreme Court of the United States

ARRON BENEDETTI; ARTHUR BENEDETTI; ESTATE OF WILLIE BENEDETTI,
Petitioners,

v.

COUNTY OF MARIN, CALIFORNIA, ET AL.,
Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the **BRIEF OF THE MANHATTAN INSTITUTE, NATIONAL ASSOCIATION OF REALTORS®, REALTORS® LAND INSTITUTE, NATIONAL ASSOCIATION OF HOME BUILDERS, CALIFORNIA FARM BUREAU FEDERATION, AND YIMBY LAW AS AMICI CURIAE IN SUPPORT OF PETITIONERS** 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 this brief contains **5,946** words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

May 29, 2026

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