

CERTIFICATE OF COMPLIANCE

No. 24-43

CITY OF FRESNO, CALIFORNIA, *ET AL.*,

Petitioners,

v.

UNITED STATES, *ET AL.*,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Mountain States Legal Foundation in Support of Petitioner contains 3,212 words, excluding the parts of the Petition for a Writ of Certiorari 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 October 9, 2025

/s/ Ivan L. London
(Signature)