

No. 25-547

In The
Supreme Court of the United States

ANDREW GRIMM,
Petitioner,
v.
CITY OF PORTLAND,
Respondent.

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

CERTIFICATE OF COMPLIANCE

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 3,517 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 November 24, 2025.

s/ Christina M. Martin
CHRISTINA M. MARTIN
Counsel of Record
Pacific Legal Foundation
4440 PGA Blvd., Suite 307
Palm Beach Gardens, FL 33410
Telephone: (916) 330-4059
CMartin@pacificlegal.org
Counsel for Amicus Curiae
Pacific Legal Foundation