IN THE Supreme Court of the United States

RICHMOND ROAD PARTNERS, LLC, ET AL., Petitioners,

υ.

CITY OF WARRENSVILLE HEIGHTS; CITY OF WARRENSVILLE HEIGHTS PLANNING COMMISSION; CITY OF WARRENSVILLE HEIGHTS BUILDING COMMISSIONER, Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF THE MANHATTAN INSTITUTE, ILLINOIS POLICY INSTITUTE, AND CITIZEN ACTION DEFENSE FUND 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 **4,216** words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

AUGUST 21, 2025

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