

CERTIFICATE OF COMPLIANCE

Docket No. 18-910

City of San Diego, California v. Public Employment Relations Board

As required by Supreme Court Rule 33.1(h), I certify that the Motion for Leave to File Amicus Brief and Brief Amicus Curiae of Pacific Legal Foundation In Support of Petitioner contains 2,879 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 February 12, 2019.



DEBORAH J. LAFETRA

Counsel of Record

Pacific Legal Foundation

930 G Street

Sacramento, California 95814

Telephone: (916) 419-7111

E-mail: DLaFetra@pacificlegal.org

*Counsel for Amicus Curiae of
Pacific Legal Foundation*