## CERTIFICATE OF COMPLIANCE

No. 23-1103

## Sawtooth Mountain Ranch, LLC, et al.,

Petitioners,

v.

## United States Forest Service, et al.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the supplemental brief in support of petition for a writ of certiorari contains **166** words, excluding the parts of the petition 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 May 16, 2024, at Los Angeles California.

<u>s/Michael M. Berger</u> Manatt, Phelps & Phillips, LLP 2049 Century Park East, Suite 1700 Los Angeles, CA 90067