IN THE SUPREME COURT OF THE UNITED STATES

FANE LOZMAN,

Petitioner,

v.

CITY OF RIVIERA BEACH.

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Amici Curiae Brief of Small Property Owners of San Francisco Institute; KDP II, LLC; Franklin Conklin Foundation; and Owners Counsel of America Supporting Petitioner, contains 3,663 words, including footnotes, but 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 March 25, 2025, at Los Angeles California.

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

403799119.1