In the Supreme Court of the United States

MINNESOTA VOTERS ALLIANCE, ET AL.,

Petitioners,

V.

JOE MANSKY, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Michael B. Kimberly, counsel for *amici curiae* and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Brief of National Association of Counties, National League of Cities, U.S. Conference of Mayors, International City/County Management Association, and International Municipal Lawyers Association as *Amici Curiae* in Support of Respondents contains 6,684 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Muhallening