

Certificate of Compliance

Pursuant to Rule 59(h), Ariz. R. Sup. Ct., and Rule 14(a)(4), Ariz. R. Civ. App. P., I certify that the attached Response to Petitioner's Petition for Special Action was prepared using Times New Roman 14-point proportionally spaced typeface. The text is double-spaced, except that indented quotations and footnotes are single-spaced. The left-hand margins of each page are 1.0 inches. The brief, exclusive of the Certificate of Service, Certificate of Compliance, and any appendices, contains 7,735 words.

Dated this 6th day of August, 2026.

STATE BAR OF ARIZONA

/s/ James D. Lee
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Senior Bar Counsel