No. 20-157

In the Supreme Court of the United States

EDWARD A. CANIGLIA,

Petitioner

v.

ROBERT F. STROM, ET AL.,

Respondents

ON WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT

## CERTIFICATION OF WORD COUNT PURSUANT TO RULE 33.1(h)

The Brief for Amici Curiae Second Amendment Law Center, Inc., California Rifle and Pistol Association, and Gun Owners of California In Support of Petitioners contains 7,969 words and thus complies with the word limitations set forth in Rule 33.1(g)(xi). This declaration is made in compliance with 28 U.S.C. § 1746.

Date: January 14, 2020

STEPHEN P. HALBROOK\*

3925 Chain Bridge Road, Suite 403

Stephen P. Hallrah

Fairfax, VA 22030

(703) 352-7276

protell@aol.com
\*Counsel of Record