

CERTIFICATE OF COMPLIANCE


No. 20-843

NEW YORK RIFLE & PISTOL ASS'N, ET AL., *Petitioners*,  
v.  
KEVIN P. BRUEN, ET AL., *Respondents*.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* THE CLAREMONT INSTITUTE'S CENTER FOR CONSTITUTIONAL JURISPRUDENCE, in the above-referenced case, contains 2,855 words, excluding the parts of the brief 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 July 14, 2021

  
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John C. Eastman  
Counsel for *Amicus Curiae*