2311 Douglas Street Omaha, Nebraska 68102-1214



E-Mail Address: contact@cocklelegalbriefs.com

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No. 22-842

THE NATIONAL RIFLE ASSOCIATION OF AMERICA, Petitioner,

MARIA T. VULLO, both individually and in her former official capacity, Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF GOLDWATER INSTITUTE AND CATO INSTITUTE IN SUPPORT OF PETITIONER in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 4647 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 10th day of January, 2024. I am duly authorized under the laws of the State of Nebraska to administer oaths.

> State of Nebraska - General Notary **ANDREW COCKLE My Commission Expires** April 9, 2026

andrew H. Colle Kenee J. Loss