In the Supreme Court of the United States

No. 22-842

NATIONAL RIFLE ASSOCIATION OF AMERICA, PETITIONER,

v.

MARIA T. VULLO, RESPONDENT.

CERTIFICATE OF WORD COUNT

I, Lisa S. Blatt, counsel for *amici curiae* First Amendment Scholars and a member of the Bar of this Court, certify that the amicus brief in support of Petitioner in the above-captioned case contains 4,508 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Lisa S. Blatt Lisa S. Blatt

January 16, 2024