In The Supreme Court of the United States

The National Rifle Association of America,

Petitioner,

v.

Maria T. Vullo, both individually and in her former official capacity,

Respondent.

On Writ of Certiorari to the United States Court of Appeals for the Second Circuit

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the **BRIEF OF CURRENT AND FORMER STATE COMMISSIONERS OF INSURANCE AND BANKING AS AMICI CURIAE SUPPORTING RESPONDENT** in case No. 22-842 contains 5,551 words, excluding parts of the document 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 the 27th day of February, 2024

<u>/s/ Beth C. Neitzel</u> Beth C. Neitzel FOLEY HOAG LLP 1717 K Street N.W. Washington, D.C. 20006 (202) 223-1200 bzeitzel@foleyhoag.com