IN THE

Supreme Court of the United States

MERRICK B. GARLAND, ATTORNEY GENERAL, ET AL.,

Petitioners,

v.

MICHAEL CARGILL,

Respondent.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Ian Simmons, a member of the bar of this Court, certify on this 21st day of December, 2023, that the Brief of Giffords Law Center to Prevent Gun Violence, Brady Center to Prevent Gun Violence, Everytown for Gun Safety, and March for Our Lives as *Amici Curiae* in Support of Petitioners in the above-captioned case contains 5,950 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ian Simmons
Ian Simmons