



CERTIFICATE OF COMPLIANCE

No. 23-852

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

Petitioners,

v.

JENNIFER VANDERSTOK, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Respondents Defense Distributed, Polymer80, Inc., Not an L.L.C. (Doing Business as JSD Supply), and the Second Amendment Foundation, Inc. contains 5,962 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio
County of Hamilton

I declare under penalty of perjury that the foregoing
is true and correct.

Executed on March 8, 2024.

Donna J. Moore

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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: March 8, 2024

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2028