

No. 20-819

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IN THE  
**Supreme Court of the United States**

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DUY T. MAI, *Petitioner*,

v.

UNITED STATES OF AMERICA, *ET AL.*, *Respondents*.

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On Petition for a Writ of Certiorari  
to the United States Court of Appeals  
for the Ninth Circuit

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**CERTIFICATE OF COMPLIANCE**

IT IS HEREBY CERTIFIED, as required by Supreme Court Rule 33.1(h), that this Brief *Amicus Curiae* of Gun Owners of America, Inc., Gun Owners Foundation, Gun Owners of California, Inc., and Heller Foundation in Support of Petitioner contains 3,359 words, excluding the 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.



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