



**CERTIFICATE OF COMPLIANCE**

No. 21-1194

VIRGINIA DUNCAN, ET AL.,

*Petitioners,*

v.

ROB BONTA, ATTORNEY GENERAL OF CALIFORNIA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Arizona, Louisiana, Oklahoma, West Virginia, Alabama, Alaska, Arkansas, Georgia, Idaho, Indiana, Kansas, Kentucky, Mississippi, Missouri, Montana, Nebraska, Ohio, South Carolina, South Dakota, Tennessee, Texas, Utah and Wyoming as *Amici Curiae* in Support of Petitioners contains 4,430 words, excluding the parts of the Brief 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 April 1, 2022.

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

Date: April 1, 2022

John D. Gallagher  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023