



### CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief *Amicus Curiae* of Gun Owners of America, Inc., Gun Owners Foundation, Gun Owners of California, Heller Foundation, Virginia Citizens Defense League, Montana Shooting Sports Association, Oregon Firearms Federation, Tennessee Firearms Association, California Constitutional Rights Foundation, America's Future, Conservative Legal Defense and Education Fund, and Restoring Liberty Action Committee in Support of Petitioners in 21-1194, *Virginia Duncan, et al. v. Rob Bonta, Attorney General of California*, were sent via Next Day Service to the U.S. Supreme Court, and 3 copies via Next Day and e-mail service to the following parties listed below, this 1st day of April, 2022:

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All parties required to be served have been served.

I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on April 1, 2022.

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Subscribed and sworn to before me by the said Affiant on the date below designated.

Date: April 1, 2022  
John D. Gallagher  
Notary Public

[seal]



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