

AFFIDAVIT OF SERVICE

SUPREME COURT OF THE UNITED STATES

No. 25-198

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VIRGINIA DUNCAN, ET AL.,

Petitioners,

v.

ROB BONTA, IN HIS OFFICIAL CAPACITY AS ATTORNEY GENERAL OF
THE STATE OF CALIFORNIA,

Respondent,

-----X

STATE OF NEW YORK)

COUNTY OF NEW YORK)

I, Ann Tosel, being duly sworn according to law and being over the age
of 18, upon my oath depose and say that:

I am retained by Counsel of Record for *Amici Curiae* Gun Owners of
America, Gun Owners Fdn., Gun Owners of California, Heller Foundation,
Coalition of N.J. Firearm Owners, Tenn. Firearms Association, Tenn. Firearms
Fdn., Va. Citizens Defense League, Va. Citizens Defense Fdn., America's
Future, U.S. Constitutional Rights Legal Defense Fund, and Conservative
Legal Defense and Education Fund.

That on the 18th day of September, 2025, I served the within *Brief
Amicus Curiae of Gun Owners of America, Gun Owners Fdn., Gun Owners of
California, Heller Foundation, Coalition of N.J. Firearm Owners, Tenn.
Firearms Association, Tenn. Firearms Fdn., Va. Citizens Defense League, Va.
Citizens Defense Fdn., America's Future, U.S. Constitutional Rights Legal
Defense Fund, and Conservative Legal Defense and Education Fund in Support
of Petitioners* in the above-captioned matter upon:

Erin E. Murphy
Counsel of Record
Clement & Murphy, PLLC
706 Duke Street
Alexandria, VA 22314
erin.murphy@clementmurphy.com
Ph: (202) 742-8900

Mica Louise Moore
Counsel of Record
California Department of Justice
300 South Spring Street, Suite
1702
Los Angeles, CA 90013
mica.moore@doj.ca.gov
Ph: 213-269-6138

by sending three copies of same, addressed to each individual respectively, through FedEx 2-Day. An electronic version was also served by email to each individual.

That on the same date as above, I sent to this Court forty copies of the within *Brief Amicus Curiae of Gun Owners of America, Gun Owners Fdn., Gun Owners of California, Heller Foundation, Coalition of N.J. Firearm Owners, Tenn. Firearms Association, Tenn. Firearms Fdn., Va. Citizens Defense League, Va. Citizens Defense Fdn., America's Future, U.S. Constitutional Rights Legal Defense Fund, and Conservative Legal Defense and Education Fund in Support of Petitioners* through the Overnight Next Day Federal Express, postage prepaid. In addition, the brief has been submitted through the Court's electronic filing system.

All parties required to be served have been served.

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

Executed on this 18th day of September, 2025.



Ann Tosel

Sworn to and subscribed before me
this 18th day of September, 2025.



MARIANA BRAYLOVSKIY
Notary Public State of New York
No. 01BR6004935
Qualified in Richmond County
Commission Expires March 30, 2026