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November 19, 2025

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE NO. 25-479: NATIONAL RIFLE ASSOCIATION OF AMERICA V. MARIA T. VULLO

Dear Sir or Madam:

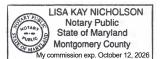
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Foundation for Individual Rights and Expression referenced above contains **3,597** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,

Jack Suber, Esq.

Principal



Sworn and subscribed before me this % h\ day of Bcj Ya VYf 2025.