

No. 25-479

In The Supreme Court of the United States

NATIONAL RIFLE ASSOCIATION OF AMERICA,
v.
MARIA T. VULLO.

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

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Jay Alan Sekulow, a member of the Bar of this Court and an attorney for amicus curiae American Center for Law and Justice, pursuant to Rule 33.1(h), hereby certifies that the Brief Amici Curiae of the American Center for Law and Justice in Support of Petitioners complies with the pertinent word limitations. The body of the document, including footnotes (but exclusive of all material preceding page one and all material following the last word of the text of the conclusion), contains 2,422 words.

/s/ Jay Alan Sekulow
Jay Alan Sekulow

November 19, 2025