

No. 25-5280

**In the
Supreme Court of the United States**

PHILIP MARQUIS

Petitioner,

v.

COMMONWEALTH OF MASSACHUSETTS,

Respondent.

**On Petition for Writ of Certiorari to the
Supreme Judicial Court of Massachusetts**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief of *Amicus Curiae* Gun Owners' Action League, Inc. in support of Petitioner contains 4,080 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.

Executed on September 5, 2025.

/s/ John Parker Sweeney

Counsel of Record

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