

No. 25-5961

In The Supreme Court of the United States

EVA MARIE GARDNER,

Petitioner,

v.

STATE OF MARYLAND,

Respondent.

**On Petition for Writ of Certiorari to the
Supreme Court of Maryland**

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Jordan Sekulow, a member of the Bar of this Court and an attorney for amicus curiae the Heller Foundation, pursuant to Rule 37.2 and 33.1(h), hereby certifies that the Brief Amicus Curiae the Heller Foundation in Support of Petitioner 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), is 4,074.

/s/ Jordan Sekulow
Jordan Sekulow

December 12, 2025