

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

EVA MARIE GARDNER,
Petitioner,
v.

STATE OF MARYLAND,
Respondent.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Kevin M. Gallagher, a member of the bar of this Court, certify that the accompanying Brief of Virginia, New Hampshire, and 22 Other States as *Amici Curiae* contains 5,696 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on December 12, 2025.

/s/ Kevin M. Gallagher
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