

CERTIFICATE OF COMPLIANCE

No. 26-46, *Calce v. City of New York*

As required by Supreme Court Rule 33.1(h), I certify that the brief for *amici curiae* Byrna Technologies, Inc. and Rob Chadwick contains 4,428 words, excluding the parts of the brief 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 August 10, 2026

/s/ Bradley A. Benbrook

Bradley A. Benbrook

Counsel for *Amici Curiae*