

**CERTIFICATE OF COMPLIANCE**

No. 23-852, *Garland v. VanDerStok*

As required by Supreme Court Rule 33.1(h), I certify that the brief for *amicus curiae* California Gun Rights Foundation contains 3,000 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 20, 2024

/s/ Stephen M. Duvernay  
Stephen M. Duvernay  
Counsel for *Amicus Curiae*