

**CERTIFICATE OF COMPLIANCE**

No. 24-178, *Oakland Tactical Supply, LLC v. Howell Township, MI*

As required by Supreme Court Rule 33.1(h), I certify that the brief for *amicus curiae* Center for Human Liberty contains 5,810 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 September 19, 2024

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