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 further certify that the motion for leave to file *amicus curiae* brief in support of petitioners contains 319 words.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 10, 2024

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