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July 7, 2017

Molly Dwyer  
Clerk of the Court  
U.S. Court of Appeals, Ninth Circuit  
95 Seventh St.  
San Francisco, CA 94103-1526

RE: *Nichols v. Brown*, U.S.C.A., 9th Circuit, Case No. 14-55873

Dear Ms. Dwyer:

Under Federal Rule of Appellate Procedure 28(j), Defendant Xavier Becerra, Attorney General of the State of California, submits the following letter to note that the Aneja, Donohue study cited at page 41 of their brief was recently updated with new data and analysis. The new study, titled *Right-to-Carry Laws and Violent Crime: A Comprehensive Assessment Using Panel Data and a State-Level Synthetic Controls Analysis* (June 2017), is available online at <http://www.nber.org/papers/w23510>, and may be downloaded without cost by any user with an e-mail account ending in ".gov."

The body of this letter contains 87 words.

Sincerely,

s/ Jonathan M. Eisenberg  
JONATHAN M. EISENBERG  
Deputy Attorney General

For XAVIER BECERRA  
Attorney General

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