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December 21, 2018

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE: No. 17-1717: THE AMERICAN LEGION, ET AL. V. AMERICAN HUMANIST

ASSOCIATION, ET AL.

No. 18-18: Maryland-national Capital Park and Planning Commission

V. AMERICAN HUMANIST ASSOCIATION, ET AL.

Dear Sir or Madam:

As a member of the Supreme Court Bar I hereby certify that at the request of counsel for *Amicus Curiae* Judicial Watch, Inc., on December 21, 2018, I caused service to be made pursuant to Rule 29 on the following counsel for the Petitioners and Respondents:

COUNSEL FOR MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION:

Neal Kumar Katyal Hogan Lovells US LLP 555 Thirteenth St., N.W. Washington, DC 20004 202-637-5528 neal.katyal@hoganlovells.com

COUNSEL FOR THE AMERICAN LEGION, ET AL.:

Michael A. Carvin Jones Day 51 Louisiana Ave., N.W. Washington, DC 20001 (202) 879-7643 macarvin@jonesday.com

COUNSEL FOR AMERICAN HUMANIST ASSOCIATION, ET AL.:

Monica Lynn Miller American Humanist Association 1821 Jefferson Place NW Washington, DC 20036 202-238-9088 mmiller@americanhumanist.org

This service was effected by depositing three copies of the Brief of *Amicus Curiae Amicus Curiae* Judicial Watch, Inc. in Support of Petitioners in an official "first class mail" receptacle of the United States Post Office as well as by transmitting a digital copy via electronic mail.

Sincerely,

Arthur D. Chotin, Esq.

Principal