

## CERTIFICATE OF SERVICE

I, Julie A. Kershner, hereby certify that 40 copies and 1 unbound copy of the foregoing Brief of *Amicus Curiae* Arizona Prosecuting Attorneys' Advisory Council in Support of Respondent in 18-1109, *James Erin McKinney v. Arizona*, were sent via Next Day Service to the U.S. Supreme Court, and 3 copies were sent via Next Day Service and e-mail to the following parties listed below, this 1st day of November, 2019:

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All parties required to be served have been served.

I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on November 1, 2019.

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Subscribed and sworn to before me by the said Affiant on the date below designated.

Date: Noren hu 1, 2019

John D. Gellyly

Notary Public

[seal]

JOHN D. GALLAGHER Notary Public, State of Ohio My Commission Expires February 14, 2023