

CERTIFICATE OF SERVICE

Jane Simkin Smith, an attorney duly admitted to practice law in this Court and the courts of New York State, under penalty of perjury, hereby affirms:

August 20, 2019, I served one true copy of the within Motion For Leave To Proceed *In Forma Pauperis* and one true copy of the Brief for Mark Orlando in Opposition, in Nassau County District Attorney's Office v. Mark Orlando, 18-1421, by mailing the same, in a post-paid envelope, in a United States Postal depository, to Madeline Singas, District Attorney, Nassau County, c/o Tammy J. Smiley, Nassau County District Attorney's Office, 262 Old Country Road, Mineola, New York, 11501.

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

Dated: August 20, 2019
Millbrook, New York

Jane Simkin Smith