

CERTIFICATE OF SERVICE

I, Julie A. Kershner hereby certify that 40 copies and 1 unbound copy of the foregoing Brief of *Amici Curiae* David I. Bruck, William B. Cummings, Julie E. McConnell, Anthony F. Troy, the Virginia Association of Criminal Defense Lawyers, the Virginia Capital Representation Resource Center, the Virginia Capital Case Clearinghouse, and the Virginia Indigent Defense Commission in Support of Respondent in 18-217, *Randall Mathena, Warden v. Lee Boyd Malvo*, were sent via Three Day Service to the U.S. Supreme Court, and 3 copies were sent via Three Day Service and email to the following parties listed below, this 27th day of August, 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 August 27, 2019.

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

Doto:

Notary Public

[seal]

Notary Public, State of Ohio My Commission Expires February 14, 2023