

CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 unbound and 40 copies of the foregoing Brief *Amici Curiae* of the American Legislative Exchange Council, Lawyers Democracy Fund, and State Government Leadership Foundation in Support of Appellants on Issue of Standing in 18-281, *Virginia House of Delegates, M. Kirkland Cox v. Golden Bethune-Hill, et al.*, 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 4th day of January, 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 January 4, 2019.

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

Date:

Notary Public

[seal]

JULIE ANNE KERSHNER
Notary Public, State of Ohio
My Commission Expires
February 21, 2023