

IN THE
Supreme Court of the United States

FORT BEND COUNTY,

Petitioner,

v.

LOIS M. DAVIS,

Respondent.

CERTIFICATE OF SERVICE

I, Ashwin P. Phatak, do hereby declare that on April 3, 2019, as required by Supreme Court Rule 29.5, I have served by first-class mail, postage pre-paid, the Brief of Constitutional Accountability Center as *Amicus Curiae* in Support of Respondent on counsel for each party to the above proceeding as follows:

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I declare under penalty of perjury that the foregoing is true and correct.
Executed on April 3, 2019.



Ashwin P. Phatak
Counsel for *Amicus Curiae*