No. 18-6135 In The

Supreme Court of the United States

JAMES K. KAHLER,

Petitioner,

v.

STATE OF KANSAS,

Respondent.

CERTIFICATE OF SERVICE

I, Matthew S. Hellman, hereby certify that I am a member of the Bar of this Court, and that I have this 7th day of June 2019, caused three copies of the Brief for the American Bar Association As *Amicus Curiae* In Support of Petitioner to be served via overnight mail and an electronic version of the document to be transmitted via the Court's electronic filing system to:

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