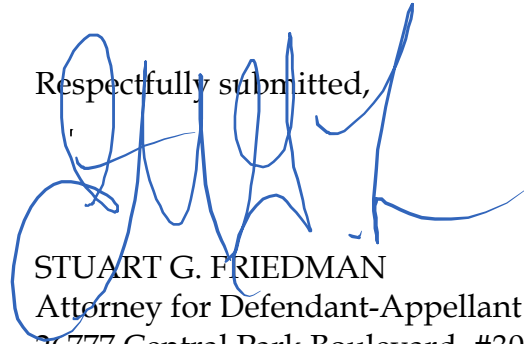


CERTIFICATE OF SERVICE

A copy of this brief was served on the Michigan Attorney General and the Office of the Solicitor General.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Stuart G. Friedman', is written over the typed name and address.

STUART G. FRIEDMAN
Attorney for Defendant-Appellant
26777 Central Park Boulevard, #300
Southfield, MI 48076
(248) 228-3322

DATED: February 20, 2019