



CERTIFICATE OF SERVICE

I, Julie A. Kershner, hereby certify that 40 copies and 1 unbound copy of the foregoing Brief of Law Professors as *Amici Curiae* Supporting Petitioners in 18-881, *American Fuel & Petrochemical Manufacturers, et al. v. Jane O'Keeffe, 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 8th day of February, 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 February 8, 2019.



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

Date: February 8, 2019
John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
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My Commission Expires
February 14, 2023