CERTIFICATE OF SERVICE

I hereby certify that, on this 22nd day of September, 2020, I caused one copy of the foregoing Reply in Support of Petition for a Writ of Certiorari, in *Rodriguez* v. *City of San Jose*, No. 19-1057, to be served by e-mail and through the Court's electronic filing system and that the parties have agreed to electronic service in lieu of paper copies:

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I further certify that all parties required to be served have been served.

s/ Donald E.J. Kilmer, Jr.
Donald E.J. Kilmer Jr.