## No. 19-1285

ANDREA LEA, in her official capacity as Auditor of the State of Arkansas,

Petitioner,

v.

UNITED STATES, et al.,

Respondents.

## **CERTIFICATE OF SERVICE**

I, John D. Ohlendorf, a member of the Supreme Court Bar, certify that I did, on the 31st day of July, 2020, send out from Washington, D.C., two packages each containing three copies of the REPLY BRIEF FOR PETI-TIONER in the above entitled case. All parties required to be served have been served by third-party commercial carrier for delivery within 3 calendar days. Packages were plainly addressed to the following:

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Date: July 31, 2020

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