

## CERTIFICATE OF SERVICE

I, Emily Mullins, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief of the Nonprofit Alliance Foundation, People for the Ethical Treatment of Animals, Association of Fundraising Professionals, and 123 Nonprofit Organizations Listed in Appendix as Amici Curiae in Support of Petitioners in 19-251 and 19-255, Americans for Prosperity Foundation v. Xavier Becerra, Attorney General of California, and Thomas More Law Center v. Xavier Becerra, Attorney General of California, was sent via Next Day Service to the U.S. Supreme Court, and Next Day e-mail service to the following parties listed below, this 1st day of March, 2021:

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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 March 1, 2021.

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

Date:

Notary Public

[seal]

JOHN D. GALLAGHER Notary Public, State of Ohio My Commission Expires February 14, 2023