

## CERTIFICATE OF SERVICE

I, Julie A. Kershner, hereby certify that 1 unbound and 40 copies of the foregoing Brief of the Civil Justice Association of California as Amicus Curiae in Support of Petitioner in 19-875, *OTO*, *L.L.C. v. Ken Kho, 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 14th day of February, 2020:

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All parties required to be served have been served.

I further declare under penalty of perjury that the This Certificate is foregoing is true and correct. executed on February 14, 2020.

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

Date: February 14, 2020

John B. Bullifun

Notary Public

[seal]

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