



CERTIFICATE OF SERVICE

I, Heather Campbell, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief of the International Academy of Family Lawyers as *Amicus Curiae* in Support of Respondent in 20-1034, *Narkis Aliza Golan v. Isacco Jacky Saada*, were sent via Next Day Service to the U.S. Supreme Court, and 3 copies via Next Day and e-mail service to the following parties listed below, this 24th day of February, 2022:

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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 24, 2022.

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

Date: February 24, 2022
John D. Gallagher
Notary Public

[seal]



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