



CERTIFICATE OF SERVICE

I, Amy Triplett Morgan, hereby certify that 1 copy of the foregoing Reply Brief of Petitioner in 20-1180, *Territory of American Samoa v. National Marine Fisheries Service, et al.*, was sent via Next Day Service to the U.S. Supreme Court, and via e-mail service to the following parties listed below, this 26th day of May, 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 May 26, 2021.



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

Date: May 26, 2021
John D. Gallagher

Notary Public

[seal]



JOHN D. GALLAGHER
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My Commission Expires
February 14, 2023