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IN THE  
SUPREME COURT OF THE UNITED STATES

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JASON FOWLER and MICAH PERKINS,  
Petitioners,

v.

BRITTANY IRISH, Individually and as  
Personal Representative of the Estate of Kyle Hewitt,  
and KIMBERLY IRISH.  
Respondents.

PROOF OF SERVICE

I, Scott J. Lynch, do hereby swear that on this date, September 23, 2021, I have served the enclosed Letter in response to Attorney Taub's Letter and Attachment, dated September 1, 2021, concerning supplemental authority on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing an envelope containing the above document in the United States mail properly addressed to each of them and with first-class postage prepaid. The names and addresses of those served are as follows:

CHRISTOPHER C. TAUB, ASST. ATTORNEY GENERAL  
OFFICE OF THE ATTORNEY GENERAL  
STATE HOUSE STATION 6  
AUGUSTA, ME 04333-0006

/s/ Scott J. Lynch, Esq.  
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