No. 20-1499

AMERICAN CIVIL LIBERTIES UNION,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF SERVICE

Pursuant to Supreme Court Rule 29.5(a), I certify a copy of the Brief of Amicus Curiae Microsoft Corporation in Support of Petitioner was sent via Federal Express to the U.S. Supreme Court on May 27, 2021. Additionally, a copy of the brief was sent to counsel for the Petitioner and Respondent by overnight Federal Express, as well as by transmitting a digital copy via electronic mail.

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> <u>/s/ Robert M. Loeb</u> Counsel of Record