

CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief *Amicus Curiae* of Gun Owners of America, Inc., Gun Owners Foundation, The Heller Foundation, and Conservative Legal Defense and Education Fund in Support of Petitioner in 20-157, *Edward A. Caniglia v. Robert F. Strom, et al.*, were sent via Next Day Service to the U.S. Supreme Court, and Next Day e-mail service to the following parties listed below, this 15th day of January, 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 January 15, 2021.

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

Date:

Notary Public

[seal]

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