



## CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 copy of the foregoing Reply Brief for Petitioners in 20-161, *City of Sacramento, Sacramento Police Department, Samuel D. Somers, John C. Tennis, and Randy R. Lozoya v. Robert Mann, Sr., Vern Murphy-Mann, and Deborah Mann*, was sent via Next Day Service to the U.S. Supreme Court, and 3 copies were sent via Next Day Service and e-mail to the following parties listed below, this 25th day of September, 2020:

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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 September 25, 2020.

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

Date: September 25, 2020

John D. Gallagher

Notary Public

[seal]



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