



### CERTIFICATE OF SERVICE

I, Emily Mullins, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief for America First Legal Foundation as *Amicus Curiae* in Support of Petitioners in 20-1775, *Arizona, et al. v. City and County of San Francisco, California, et al.*, were sent via Next Day Service to the U.S. Supreme Court, and 3 copies were sent via Next Day and e-mail service to the following parties listed below, this 17th day of December, 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 December 17, 2021.



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

Date: December 17, 2021

John D. Gallagher  
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[seal]



**JOHN D. GALLAGHER**  
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My Commission Expires  
February 14, 2023