No. 20-18 In The

Supreme Court of the United States

ARTHUR GREGORY LANGE,

Petitioner,

v.

CALIFORNIA,

Respondent.

CERTIFICATE OF SERVICE

I, Jessica Ring Amunson, hereby certify that I am a member of the Bar of this Court, and that I have this 11th day of December 2020, caused three copies of the Brief of The DKT Liberty Project, Law Enforcement Action Partnership, Reason Foundation, and Due Process Institute as *Amici Curiae* in Support of Petitioner to be served via overnight mail and an electronic version of the document to be transmitted via the Court's electronic filing system to:

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/s/ Jessica Ring Amunson Jessica Ring Amunson