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No. 20-18

ARTHUR GREGORY LANGE,

Petitioner.

v.

STATE OF CALIFORNIA,

Respondent.

AFFIDAVIT OF SERVICE

I HEREBY CERTIFY that on December 11, 2020, three (3) copies of the BRIEF OF THE RUTHERFORD INSTITUTE AS *AMICUS CURIAE* IN SUPPORT OF PETITIONER in the above-captioned case were served, as required by U.S. Supreme Court Rule 29.5(c), on the following:

BRIAN HALLIGAN FLETCHER STANFORD LAW SCHOOL SUPREME COURT CLINIC 559 Nathan Abbott Way Stanford, CA 94305

AMANDA KELLY RICE JONES DAY 150 W. Jefferson Ave., Suite 2100 Detroit, MI 48226 SAMUEL THOMAS HARBOURT CALIFORNIA DEPARTMENT OF JUSTICE, OFFICE OF THE SOLICITOR GENERAL 455 Golden Gate Ave Suite 11000 San Francisco, CA 94102

The following email addresses have also been served electronically:

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Sworn to and subscribed before me this 11th day of December 2020.

COLIN CASEY HOGAN NOTARY PUBLIC

District of Columbia

My commission expires April 14, 2022.