

No. \_\_\_\_\_

**CERTIFICATE OF SERVICE**

---

PATRICIA NELSON, Next friend of N.K., a minor, *Petitioner*

v.

ESTEBAN RIVERA, *Respondent*.

---

Pursuant to Rule 29 of this Court, I hereby certify that I am a member in good standing of the bar of this Court and that on this 26<sup>th</sup> day of August, 2020, the Petition for a Writ of Certiorari in the above-captioned case was served electronically, as permitted by the Supreme court's April 15, 2020 Order, on the following, who has consented to electronic service:

C. Marcel Stoetzel III  
City Attorney's Office  
10 N. Division Street Ste. 207  
Battle Creek, MI 49014  
cmstoetzel@battlecreekmi.gov

/s/ Christopher J. Trainor  
*Attorney for Petitioner*