

CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 copy of the foregoing Brief of the Cato Institute, the Competitive Enterprise Institute, and the Chamber of Commerce of the United States of America as Amici Curiae in Support of Petitioner in 20-276, Christopher M. Gibson v. Securities and Exchange Commission, et al., was sent via Three Day Service to the U.S. Supreme Court, and 3 copies were sent via Three Day Service and email to the following parties listed below, this 5th day of October, 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 October 5, 2020.

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

Date.

Notary Public

[seal]

JOHN D. GALLAGHER Notary Public, State of Ohio My Commission Expires