



## CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 copy of the foregoing Reply Brief for Petitioners in 20-289, *Retirement Plans Committee of IBM, et al. v. Larry W. Jander, et al.*, was sent via Next Day Service to the U.S. Supreme Court, and 3 copies were sent via e-mail service to the following parties listed below, this 20th 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 20, 2020.

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

Date: October 20, 2020  
John D. Gallagher  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
**My Commission Expires**  
February 14, 2023