



CERTIFICATE OF SERVICE

I, Emily Mullins, hereby certify that 1 copy of the foregoing Brief *Amici Curiae* for the National Association of Counties, the National League of Cities, the U.S. Conference of Mayors, the International City/County Management Association, and the International Municipal Lawyers Association in Support of the Petitioner in 20-427, *Polk County, v. J.K.J. and M.J.J.*, was sent via Three Day Service to the U.S. Supreme Court, and 3 copies were sent via Three Day Service and e-mail to the following parties listed below, this 2nd day of November, 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 November 2, 2020.



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

Date: November 2, 2020



Notary Public

[seal]



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