



CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 copy of the foregoing Reply Brief for Petitioner in 20-427, *Polk County v. J.K.J. and M.J.J.*, was sent via Next Day Service to the U.S. Supreme Court, and via e-mail service to the following parties listed below, this 23rd day of December, 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 December 23, 2020.

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

Date: December 23, 2020

John D. Callagher
Notary Public

[seal]



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