No. 20-54 IN THE

Supreme Court of the United States

BRIDGE AINA LE 'A, LLC,

Petitioner

V.

STATE OF HAWAII LAND USE COMMISSION,

Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

CERTIFICATE OF SERVICE

As required by Supreme Court Rule 29.5(b), I certify that on August 20, 2020, I caused to be served, via United States Mail, first class, postage prepaid, the BRIEF OF FOUR TAKINGS SCHOLARS IN SUPPORT OF PETITIONER in the above-captioned case on the following:

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 20, 2020.

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