SUPREME COURT OF THE UNITED STATES No. 20-54

BRIDGE AINA LE'A, LLC,

Petitioner,

υ.

STATE OF HAWAII LAND USE COMMISSION,

Respondent,

CERTIFICATE OF SERVICE

As required by Supreme Court Rule 29.5, I certify that on August 21, 2020, I caused the BRIEF OF AMICI CURIAE OWNERS' COUNSEL OF AMERICA, NATIONAL ASSOCIATION OF REVERSIONARY PROPERTY OWNERS, NFIB SMALL BUSINESS LEGAL CENTER, REASON FOUNDATION, AND PROFESSOR SHELLEY ROSS SAXER, to be served upon the following by delivering the brief to a commercial carrier for delivery to the above parties within three calendar days.

Michael M. Berger Manatt, Phelps & Phillips LLP 2049 Century Park East Suite 1700 Los Angeles, CA 90067

Kimberly Tsumoto Guidry Department of the Attorney General, State of HI 425 Queen St. Honolulu, HI 96813

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

Executed on August 21, 2020.

MARKA. (TNOR) HEARNE, II Counsel of Record for Amici Curiae