

No. 20-559

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IN THE  
**Supreme Court of the United States**

\_\_\_\_\_  
JANE DOE,

*Petitioner,*

v.

UNITED STATES,

*Respondent.*

\_\_\_\_\_  
**CERTIFICATE OF SERVICE**  
\_\_\_\_\_

I, Brianne J. Gorod, do hereby declare that on November 30, 2020, as required by Supreme Court Rule 29.5, I have served by first-class mail, postage pre-paid, the Brief of Constitutional Accountability Center and The Rutherford Institute as *Amici Curiae* in Support of Petitioner on counsel for each party to the above proceedings as follows:

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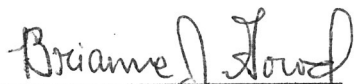
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I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 30, 2020.

A handwritten signature in black ink, appearing to read "Brianne J. Gorod". The signature is written in a cursive style with a horizontal line drawn across the middle of the name.

Brianne J. Gorod

Counsel for *Amici Curiae*