



## CERTIFICATE OF SERVICE

I, Emily Mullins, hereby certify that the original copy of the foregoing Brief of Amicus Curiae National Association of Parents, Inc. d/b/a ParentsUSA in Support of Petitioner in No. 20-618, *Kelly Georgene Routten v. John Tyler Routten*, was e-filed and sent via Three Day Service to the U.S. Supreme Court, and was sent via Three Day Service and e-mail to the following parties listed below, this 7th 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 7, 2020.

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

Date: *December 7, 2020*

*John D. Gallagher*

Notary Public

[seal]



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