

CERTIFICATE OF SERVICE

I, Michael F. Smith, counsel for the *Amici Curiae*, pursuant to this Court's April 15, 2020 Order Regarding Filings, hereby certify that on this 23rd day of December, 2020, I caused copies of the Motion for Leave to File *Amicus Curiae* Brief (with included brief) to be served on the following counsel:

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Counsel for Petitioners and Counsel for Respondents Commonwealth of Pennsylvania, Thomas W. Wolf, and Kathy Boockvar have agreed to email service only. Counsel for Respondent Pennsylvania General Assembly is being served by email and by first-class mail, postage prepaid to his address above.

I further certify that all parties required to be served have been served.

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

/s/ Michael F. Smith
Michael F. Smith

December 23, 2020