

No. 20-911

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

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MICHAEL JACKSON,  
*Petitioner,*

v.

DON HUDSON, WARDEN,  
*Respondent.*

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**CERTIFICATE OF SERVICE**

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As required by Supreme Court Rule 29.5, I hereby certify that three copies of the Brief for Jonathan F. Mitchell and Adam K. Mortara as *Amici Curiae* in Support of Respondent in *Jackson v. Hudson*, No. 20-911, were served via overnight mail on all parties required:

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

Date: May 10, 2021

/s/ *Eric Tung*

Eric Tung