## IN THE SUPREME COURT OF THE UNITED STATES

No. 20-937

Robert Andrews, Petitioner, v. State of New Jersey, Respondent.

## CERTIFICATE OF SERVICE

Pursuant to Supreme Court Rule 29.5(a), I, Ryan G. Baker, counsel for Laurent Sacharoff, hereby certify that a digital copy of the Brief of Laurent Sacharoff, Professor of Law at the University of Arkansas, as *Amicus Curiae* in Support of Petition for Certiorari was sent to counsel for Petitioner and Respondent by electronic mail on February 12, 2021. The parties have consented to electronic service.

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