



CERTIFICATE OF SERVICE

I, Emily Mullins, hereby certify that 1 copy of the foregoing Brief of *Amicus Curiae* City of Jersey City in Support of Petitioner in 20-989, *City of Newark v. Fraternal Order of Police Newark Lodge No. 12*, was sent via Next Day Service to the U.S. Supreme Court, and Next Day service and e-mail service to the following parties listed below, this 25th day of February, 2021:

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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 February 25, 2021.

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

Date: February 25, 2021

John D. Gallagher

Notary Public

[seal]



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