



### CERTIFICATE OF SERVICE

I, Emily Mullins, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief for *Amici Curiae* Law Professors in Support of Petitioner in 21-1170, *Louis Ciminelli v. United States of America*, were sent via Next Day Service to the U.S. Supreme Court, and 3 copies were sent via Next Day Service and e-mail to the following parties listed below, this 6th day of September, 2022:

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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 September 6, 2022.



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

Date: September 6, 2022  
John D. Gallagher

Notary Public

[seal]



JOHN D. GALLAGHER  
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My Commission Expires  
February 14, 2023