



## CERTIFICATE OF SERVICE

I, Heather Campbell, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief of the Kentucky Jailers Association as *Amicus Curiae* in Support of Petitioner in 21-1210, *Scott County, Tennessee v. Tammy Brawner*, was sent via Two Day Service to the U.S. Supreme Court, and 3 copies were sent via Two Day Service and e-mail to the following parties listed below, this 4th day of April, 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 April 4, 2022.

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

Date: April 4, 2022

John D. Gallagher  
Notary Public

[seal]



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