IN THE

Supreme Court of the United States

SECURITIES & EXCHANGE COMMISSION,

Petitioners,

v. MICHELLE COCHRAN,

Respondent.

AFFIDAVIT OF SERVICE

I HEREBY CERTIFY that all parties required to be served, have been served, on this 7th day of July, 2022, in accordance with U.S. Supreme Court Rule 29.3, three (3) copies of the foregoing **BRIEF FOR THE INSTITUTE FOR JUSTICE AS AMICUS CURIAE IN SUPPORT OF RESPONDENT** by placing said copies in the U.S. mail, first class postage prepaid, addressed as listed below.

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Signed and sworn to (or affirmed) before me on 7th day of July, 2022.

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KAREN PIERANGELI

NOTARY PUBLIC, DISTRICT OF COLUMBIA

My Commission Expires June 14, 2025.