

IN THE SUPREME COURT OF THE UNITED STATES

No. 21-1239

SECURITIES AND EXCHANGE COMMISSION, ET AL., PETITIONERS

v.

MICHELLE COCHRAN, RESPONDENT

CERTIFICATE OF SERVICE

I, Sarah M. Harris, counsel for amicus curiae Chamber of Commerce of the United States of America and a member of the Bar of this Court, certify that, on July 7, 2022, the amicus brief for the Chamber of Commerce of the United States of America in Support of Respondent was sent, by third-party commercial carrier for delivery overnight and via electronic mail, to the following counsel:

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I further certify that all parties required to be served have been served.

/s/ Sarah M. Harris

Sarah M. Harris