

**CERTIFICATE OF SERVICE**

No. 21-1394

JOHN FITISEMANU, *et al.*,

*Petitioners,*

v.

UNITED STATES OF AMERICA, *et al.*,

*Respondents.*

I, Steven J. Horowitz, do hereby certify that, on this thirty-first day of May, 2022, I caused three copies and an electronic copy of the Brief of Citizenship Scholars as *Amici Curiae* in Support of Petitioners in the foregoing case to be served by first class mail, postage prepaid, and by email, on the following:

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