



### CERTIFICATE OF SERVICE

I, Emily Mullins, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief for *Amici Curiae* International Municipal Lawyers Association and California State Association of Counties in Support of Petitioner in 21-499, *Carlos Vega v. Terence B. Tekoh*, 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 3rd day of November, 2021:

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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 November 3, 2021.



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

Date: November 3, 2021

John D. Gallagher  
Notary Public

[seal]



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