



CERTIFICATE OF SERVICE

I, Emily Mullins, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief for the American Conservative Union Foundation Nolan Center for Justice and the Cato Institute as *Amici Curiae* in Support of Petitioner in 21-551, *John J. Watford v. United States of America*, were sent via Two Day Service to the U.S. Supreme Court, and 3 copies were sent via Two Day and e-mail service to the following parties listed below, this 15th 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 15, 2021.



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

Date: November 15, 2021

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
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My Commission Expires
February 14, 2023