



## CERTIFICATE OF SERVICE

I, Heather Campbell, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief for the National Federation of Independent Business Small Business Legal Center as *Amicus Curiae* in Support of Petitioner in 21-563, *Warren M. Lent, et al. v. California Coastal Commission, et al.*, 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 17th 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 17, 2021.

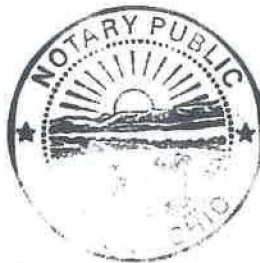
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Subscribed and sworn to before me by the said Affiant on the date below designated.

Date: November 17, 2021

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[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
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February 1, 2023