No. 21-771 IN THE Supreme Court of the United States

JUSTIN HERRERA,

Petitioner,

v.

TERESA CLEVELAND, SAMUEL DIAZ, AND ENRIQUE MARTINEZ,

Respondents.

CERTIFICATE OF SERVICE

I, David A. Strauss, hereby certify that I am a member of the Bar of this Court, and that I have this 27th day of December 2021, caused three copies of the Brief of Civil Procedure Scholars as *Amici Curiae* in Support of Petitioner to be served via overnight mail and an electronic version of the document to be transmitted via the Court's electronic filing system to:

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/s/ David A. Strauss David A. Strauss