

CERTIFICATE OF SERVICE

I, Julie A. Connor, hereby certify that 40 copies of the foregoing Brief For Amici Curiae City And County Of San Francisco, Local Government Legal Center, National Association Of Counties, National League Of Cities, International Municipal Lawyers Association, And Government Finance Officers Association In Support Of Respondent in 22-1074, George Sheetz v. County of El Dorado, California, 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 19th day of December, 2023:

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All parties required to be served have been served.

State of Ohio County of Hamilton

I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on December 19, 2023.

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

Date: December 19 onna Jo Marie Notary Public

[seal]



DONNA JO MOORE Notary Public, State of Ohio My Commission Expires November 27, 2027