IN THE

Supreme Court of the United States

GERALDINE TYLER,

Petitioner,

v.

HENNEPIN COUNTY, ET AL.,

Respondents.

PROOF OF SERVICE

I, Rita L. Hemenway of Bateman & Slade, Inc., hereby certify that on this sixth day of March 2023, I have served three (3) true copies of the Brief of Amicus Curiae New England Legal Foundation in Support of Petitioner by priority mail, postage prepaid upon:

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Signed under the pains and penalties of perjury,

/s/Rita L. Hemenway

Rita L. Hemenway

NOTARIZED BY:

/s/George D. Baleman

George D. Bateman

My Commission Expires: May 30, 2025