



## CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief for the States of Alaska, Alabama, Arkansas, Indiana, Kansas, Louisiana, Montana, Nebraska, South Carolina, Tennessee, Utah, and West Virginia as *Amici Curiae* in Support of Petitioners in 22-212, *Jonathan Savas, et al. v. California State Law Enforcement Agency, et al.*, were sent via Two Day Service to the U.S. Supreme Court, and 3 copies were sent via Two Day Service and e-mail to the following parties listed below, this 11th day of October, 2022:

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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 October 11, 2022.

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

Date: October 11, 2022  
John D. Gallagher  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023