



CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Reply Brief in 22-443 *Michael S. Zummer v. Jeffrey S. Sallet, et al.*, 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 24th day of February, 2023:

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All parties required to be served have been served.

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I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on February 24, 2023.

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

Date: 2-24-2023

Don S. Moore
Notary Public

[seal]



DOUGLAS S. MOORE
Notary Public, State of Ohio
My Commission Expires
December 18, 2027