



## CERTIFICATE OF SERVICE

I, Emily Mullins, hereby certify that 40 copies of the foregoing Brief for *Amicus Curiae* Pioneer Public Interest Law Center in Support of Respondents in 22-859, *Securities and Exchange Commission v. George R. Jarkesy, Jr. and Patriot28, L.L.C.*, 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 18th day of October, 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 October 18, 2023.



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

Date: October 18, 2023

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[seal]



JOHN D. GALLAGHER  
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My Commission Expires  
February 14, 2028