



## CERTIFICATE OF SERVICE

I, Emily Mullins, hereby certify that 40 copies of the foregoing Brief of International Municipal Lawyers Association, National Association of Counties, California State Association of Counties, and League of California Cities as *Amici Curiae* in Support of Petitioners in 23-270, *County of Tulare, et al. v. Jose Murguia, for himself and for the Estates of Mason and Maddox Murguia, 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 20th day of October, 2023:

Roman Martinez V  
Latham & Watkins, LLP  
555 Eleventh Street, NW  
Suite 1000  
Washington, DC 20004  
(202) 637-3377  
roman.martinez@lw.com

*Counsel for Petitioners*

Robert Alan Rees  
Rees Law Firm PC  
1801 Century Park East  
Suite 1600  
Los Angeles, CA 90067  
(310) 277-7071  
robertreeslaw@att.net

*Counsel for Respondent Jose Murguia, for himself and for the Estates of Mason and Maddox Murguia*

Michael E. Lehman  
Tyson Mendes  
5200 N. Palm, Suite 311  
Fresno, CA 93704  
(559) 500-2294  
mlehman@tysonmendes.com

*Counsel for Respondent First Assembly of God of  
Visalia*

Heather Langdon  
Patton State Hospital  
3102 E. Highland Ave., Unit 34  
Patton, CA 92369  
[email address unknown]

*Respondent Heather Langdon*

Gregg W. Kettles  
*Counsel of Record*  
Best Best & Krieger LLP  
3390 University Avenue, 5th Floor  
Riverside, CA 92501  
(213) 617-8100  
gregg.kettles@bbklaw.com

*Counsel for Amici Curiae*

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 October 20, 2023.

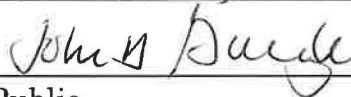


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Emily Mullins  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

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

Date: October 20, 2023



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Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2028