



## CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Petition for Writ of Certiorari in *Henry H. Howe v. Steven Gilpin, 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 11<sup>th</sup> 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 11, 2023.

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

Date: October 11, 2023  
John D. Gallagher  
Notary Public

[seal]



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