No. 23-636

IN THE Supreme Court of the United States

ATIF AHMAD RAFAY,

Petitioner,

v.

ERIC JACKSON,

Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

CERTIFICATE OF SERVICE

I am a member of the Bar of this Court, and I hereby certify pursuant to Supreme Court Rules 29.3 and 29.5 that I have, this 22^{nd} day of January, 2024, served the Brief of Law Enforcement Training and Interrogation Experts as *Amici Curiae* Supporting Petitioner upon each party separately represented in this proceeding by causing three copies to be delivered by first-class mail to counsel of record at the addresses listed below:

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I further certify that, pursuant to Supreme Court Rule 29.3, I have caused an electronic copy of the brief to be served on the parties at the email addresses listed above.

I further certify that all persons required to be served have been served.

January 22, 2024

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