## No. 23-719

## IN THE

## Supreme Court of the United States

DONALD J. TRUMP,

Petitioner,

v.

NORMA ANDERSON, ET AL., Respondents.

## CERTIFICATE OF SERVICE

I, Susan J. Kohlmann, hereby certify that I am a member of the Bar of this Court, and that I have on this 18th day of January, 2024, caused three copies of the Brief for the Association of the Bar of the City of New York as *Amicus Curiae* in Support of Neither Party to be served via overnight mail, and an electronic version of these documents to be transmitted via the Court's electronic filing system and email, to:

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/s/ Susan J. Kohlmann Susan J. Kohlmann