



## CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Brief for U.S. Term Limits as *Amicus Curiae* in Support of Neither Party in 23-719, *Donald J. Trump v. Norma Anderson, 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 18th day of January, 2024:

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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 January 18, 2024.

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

Date: January 18, 2024  
John D. Gallagher  
Notary Public

[seal]



JOHN D. GALLAGHER  
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My Commission Expires  
February 14, 2028