



## CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Brief of Amicus Curiae Professor Ilya Somin in Support of Respondent 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 31st day of January, 2024:

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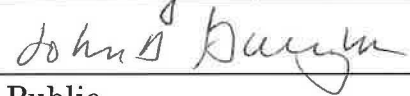
All parties required to be served have been served.

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 January 31, 2024.

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

Date: January 31, 2024  
  
\_\_\_\_\_  
Notary Public

[seal]



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