



CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Supplemental Brief in 23-862, *West Flagler Associates, Ltd., et al. v. Debra Haaland, 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 29th day of March, 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 March 29, 2024.

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

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[seal]



JOHN D. GALLAGHER
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My Commission Expires
February 14, 2028