



CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Brief of Amici Curiae Former State Attorneys General, United States Attorneys, and Prosecutors in Support of Petitioner in 23-934, *Areli Escobar v. State of Texas*, 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 28th 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 28, 2024.

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

Date: March 28, 2024
John D. Gallagher
Notary Public

[seal]



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