

**CERTIFICATE OF SERVICE**

The undersigned certifies that on March 19, 2024, he served, or will have served by the end of the day, by putting in the mail by way of the United States Postal Service, first-class mail:

re 23-939, the Brief of *Amicus Curiae* David Boyle in Support of Neither Party, addressed to the counsel listed below, each receiving three copies of that document; and to the Court, is presently putting in the mail, with this Certificate, forty paper copies of that document.

List of counsel:

D. John Sauer  
*Counsel of Record*  
James Otis Law Group, LLC  
13321 North Outer Forty Road  
Suite 300  
St. Louis, MO 63017  
(314) 562-0031  
John.Sauer@james-otis.com  
*Counsel for Petitioner Donald J. Trump in 23-939*

Michael R. Dreeben  
*Counsel of Record*  
Counselor to the Special Counsel  
Department of Justice  
950 Pennsylvania Ave, NW  
Washington, DC 20530  
(202) 305-9654  
SCO\_JLS\_SupremeCtBriefs@usdoj.gov  
*Counsel for Respondent United States of America in 23-939*

Elizabeth Prelogar  
Solicitor General  
Department of Justice  
950 Pennsylvania Avenue, NW  
Room 5616  
Washington, DC 20530-0001  
(202) 514-2217  
SupremeCtBriefs@usdoj.gov

March 19, 2024

Sincerely and respectfully,

David Boyle  
*Counsel of Record*  
P.O. Box 15143  
Long Beach, CA 90815  
dbo@boyleslaw.org  
(734) 904-6132