



### CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Motion for Leave to File Brief as *Amicus Curiae* and Brief for *Amicus Curiae* National Association for Public Defense in Support of Petitioner in 23-953, *Brandon Michael Council v. United States of America*, were sent via Two Day Service to the U.S. Supreme Court, and 3 copies were sent via Two Day Service and e-mail to the following parties listed below, this 1st day of April, 2024:

Catherine Emily Stetson  
Hogan Lovells US LLP  
555 13th Street, N.W.  
Washington, DC 20004-1109  
(202) 637-5491  
cate.stetson@hoganlovells.com

*Counsel for Petitioner*

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

*Counsel for Respondent*

Kathryn Ali  
*Counsel of Record*  
Ali & Lockwood LLP  
300 New Jersey Avenue NW, Suite 900  
Washington, DC 20001  
(202) 651-2475  
katie.ali@alilockwood.com

*Counsel for Amicus Curiae*

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 April 1, 2024.

Donna J. Moore

Donna J. Moore  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive  
Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

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

Date: April 1, 2024

John D. Gallagher  
Notary Public

[seal]



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