



## 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:

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All parties required to be served have been served.

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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.

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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