

**PROOF OF SERVICE**  
No. 24-178, *Oakland Tactical Supply, LLC v. Howell Township, MI*

I, Stephen M. Duvernay, a member of the Bar of the United States Supreme Court, certify that on September 30, 2024, I caused the foregoing Motion for Leave to File Amicus Curiae Brief to be electronically filed with the Clerk of the U.S. Supreme Court, as well as causing an original and ten copies of said Motion to be delivered to the Clerk via U.S. mail in a properly addressed, first class postage paid envelope; and to be served on all parties, electronically and via U.S. first class mail, as follows:

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Executed on September 30, 2024

/s/ Stephen M. Duvernay  
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