



CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 unbound copy and 40 copies of the foregoing Brief of Professor Richard M. Re as *Amicus Curiae* in Support of Neither Party in 17-155, *Erik Lindsey Hughes v. United States*, 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 26th day of January, 2018:

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All parties required to be served have been served.

I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on January 26, 2018.

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

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Notary Public

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JULIE ANNE KERSHNER
Notary Public, State of Ohio
My Commission Expires
February 21, 2018