



## CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 unbound and 40 copies of the foregoing Brief of Amicus Curiae American Association for Justice in Support of the Respondent in 17-988, *Lamps Plus, Inc., et al. v. Frank Varela*, 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 6th day of September, 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 September 6, 2018.

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

Date: September 6, 2018

J. A. Kershner  
Notary Public

[seal]



JULIE ANNE KERSHNER  
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My Commission Expires  
February 21, 2023