

---

In the Supreme Court of the United States

---

PUTNAM INVESTMENTS, LLC, *et al.*,

*Petitioners,*

v.

JOHN BROTHERSTON, *et al.*,

*Respondents.*

**CERTIFICATE OF SERVICE**

I, Nicole A. Saharsky, counsel for the American Council of Life Insurers and a member of the Bar of this Court, certify that on this 15th day of February, 2019, I caused three copies of this Brief of the American Council of Life Insurers as *Amicus Curiae* Supporting Petitioners to be served by overnight mail and electronic means on the following:

William M. Jay  
Goodwin Procter LLP  
901 New York Avenue, NW  
Washington, DC 20001  
wjay@goodwinlaw.com

James H. Kaster  
Nichols Kaster, PLLP  
4600 IDS Center  
80 South 8th Street  
Minneapolis, MN 55402  
kaster@nka.com

I further certify that all parties required to be served have been served.

Sincerely,



Nicole A. Saharsky