



CERTIFICATE OF SERVICE

I, Emily Mullins, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief of the Association of National Advertisers (ANA) and the ANA Non-Profit Federation as *Amici Curiae* in Support of Petitioners in 19-251 and 19-255, *Americans for Prosperity Foundation v. Xavier Becerra*, in his official capacity as the Attorney General of California, and *Thomas More Law Center v. Xavier Becerra*, in his official capacity as the Attorney General of California, was sent via Next Day Service to the U.S. Supreme Court, and Next Day e-mail service to the following parties listed below, this 1st day of March, 2021:

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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 March 1, 2021.



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

Date: March 1, 2021

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023