



## CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 40 copies and 1 unbound copy of the foregoing Brief of Amicus Curiae National Association of Bankruptcy Trustees in Support of Respondents in 19-357, *City of Chicago, Illinois v. Robbin L. Fulton, et al.*, 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 11th day of March, 2020:

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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 11, 2020.

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

Date: March 11, 2020

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Notary Public

[seal]



JULIE ANNE KERSHNER  
Notary Public, State of Ohio  
My Commission Expires  
February 21, 2023