



CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief of Prof. Ashley R. Berner as *Amicus Curiae* in Support of Petitioners in 20-1088, *David and Amy Carson, as parents and next friends of O.C., et al. v. A. Pender Makin*, 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 10th day of September, 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 September 10, 2021.

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

Date: September 10, 2021

John D. Gallagher
Notary Public

[seal]



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