



## CERTIFICATE OF SERVICE

I, Emily Mullins, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief of Iowa, Louisiana, Minnesota, Montana, Oklahoma, South Carolina, South Dakota, Texas, and Utah as *Amici Curiae* in Support of Respondents in 20-157, *Edward A. Caniglia v. Robert F. Strom, et al.*, was sent via Next Day Service to the U.S. Supreme Court, and via Next Day and e-mail service to the following parties listed below, this 18th day of February, 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 February 18, 2021.

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

Date: February 18, 2021

John D. Gallagher  
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[seal]



**JOHN D. GALLAGHER**  
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My Commission Expires  
February 14, 2023