

No. 20-18

IN THE  
**Supreme Court of the United States**

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ARTHUR GREGORY LANGE,

*Petitioner,*

v.

STATE OF CALIFORNIA,

*Respondent.*

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CERTIFICATE OF SERVICE

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I hereby certify that I am a member in good standing of the bar of this Court and that on this 15th day of January, 2021, I caused three copies of the Brief of Professor Steven Penney as *Amicus Curiae* in Support of the Judgment Below to be served by third-party commercial carrier on the counsel identified below, and caused an electronic version to be transmitted to the counsel identified below, pursuant to Rule 29.5 of the Rules of this Court. All parties required to be served have been served.

Brian H. Fletcher  
STANFORD LAW SCHOOL  
SUPREME COURT CLINIC  
559 Nathan Abbott Way  
Stanford, CA 94305  
(650) 724-3345  
bfletcher@law.stanford.edu

*Counsel for Petitioner*

Amanda K. Rice  
JONES DAY  
150 West Jefferson Avenue  
Detroit, MI 48226  
(313) 230-7926  
arice@jonesday.com

*Court-Appointed Amicus Curiae in  
Support of the Judgment Below*

Samuel T. Harbourt  
CALIFORNIA DEPARTMENT OF JUSTICE  
455 Golden Gate Avenue  
San Francisco, CA 94102  
(415) 510-3919  
samuel.harbourt@doj.ca.gov

*Counsel for Respondent*



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David Debold