



## CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 copy of the foregoing Brief in Opposition in 20-331, *Donald J. Trump, President of the United States v. District of Columbia, et al.*, was sent via Three Day Service to the U.S. Supreme Court, and 3 copies were sent via Three Day Service and e-mail to the following parties listed below, this 14th day of December, 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 December 14, 2020.

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

Date: December 14, 2020  
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[seal]



**JOHN D. GALLAGHER**  
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February 14, 2023