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December 18, 2020

Supreme Court of the United States
One First Street, N.E.
Washington, D.C. 20543
Attn.: Scott S. Harris
Clerk of the Court

Re: *King v. Whitmer*
Docket No. 20-815

Dear Mr. Harris:

I certify that I caused service of one copy of my *Amicus Curiae* brief to be served, by First Class mail of the United States Post Office and by electronic mail, on each of the following counsel for the parties in the above-referenced matter:

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Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

s/ Todd C. Bank

Todd C. Bank