

**CERTIFICATE OF SERVICE**

No. 20-891

In the Supreme Court of the United States

AMERICAN AXLE & MANUFACTURING, INC.,  
*Petitioner,*

*v.*

NEAPCO HOLDINGS LLC AND  
NEAPCO DRIVELINES LLC.,  
*Respondents.*

I, Jeremy Cooper Doerre, a member of the Bar of this Court, do hereby certify that on this 1st day of March, 2021, I caused an electronic copy of the Brief of Jeremy C. Doerre as Amicus Curiae in Support of Petitioner to be served by email on the following counsel for the parties, each of whom has consented to electronic service in accordance with this Court’s indication in its order of April 15, 2010 that “parties may be relieved of the obligation to effect service of paper versions of filings upon other parties if they agree to electronic service” and that “parties are strongly encouraged to use electronic service if feasible”:

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I further certify that all parties required to be served have been served.

Pursuant to the Court's Order of April 15, 2020 indicating that "with respect to every document filed in a case prior to a ruling on a petition for a writ of certiorari or petition for an extraordinary writ, or a decision to set an appeal for argument, a single paper copy of the document, formatted on 8½ x 11 inch paper, may be filed," and that "[t]he document may be formatted under the standards set forth in Rule 33.2, or under the standards set forth in Rule 33.1 but printed on 8½ x 11 inch paper," I also certify that on this 1st day of March, 2021, I caused one copy of this brief formatted under the standards set forth in Rule 33.1 but printed on 8½ x 11 inch paper to be sent via a third-party commercial carrier (FedEx) for delivery to the Clerk of this Court within 3 calendar days.

In addition, this brief has been submitted electronically through the Court's electronic filing system.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 1, 2021



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