

No. 21-1360

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**In the Supreme Court of the United States**

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MIKE KOWALL, ET AL, PETITIONERS

v.

JOCELYN BENSON, MICHIGAN SECRETARY OF STATE

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**ON PETITION FOR A WRIT OF  
CERTIORARI TO THE  
UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT**

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**PROOF OF SERVICE**

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The undersigned certifies that on August 1, 2022, she served the Brief in Opposition and Certificate of Compliance by emailing same to the email address provided: [jbursch@burschlaw.com](mailto:jbursch@burschlaw.com).

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*Holly Gustafson 8/1/2022*

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MIKE KOWALL, ET AL, PETITIONERS  
v.  
JOCELYN BENSON, MICHIGAN SECRETARY OF STATE

**AFFIDAVIT OF SERVICE**

I, Andrew Cockle, of lawful age, being duly sworn, upon my oath state that I did, on the 1st day of August, 2022, send out from Omaha, NE 1 package(s) containing 3 copies of the BRIEF IN OPPOSITION in the above entitled case. All parties required to be served have been served by third-party commercial carrier for delivery within 3 calendar days. Packages were plainly addressed to the following:

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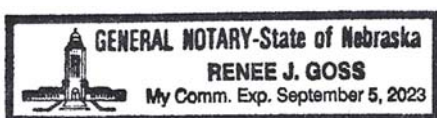
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Subscribed and sworn to before me this 1st day of August, 2022.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.



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