

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

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THE OHIO ADJUTANT GENERAL'S DEP'T ET AL., *Petitioners*,  
v.  
FEDERAL LABOR RELATIONS AUTHORITY ET AL., *Respondents*.

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**CERTIFICATE OF SERVICE**

I, Charles A. Rothfeld, counsel for *Amici Curiae* Military Law Scholars and a member of the Bar of this Court, certify that on this 16th day of December, 2022, I caused three copies of this Brief for Military Law Scholars as *Amici Curiae* Supporting Respondents to be served by overnight delivery, and by electronic means, on the following:

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

*/s/ Charles A. Rothfeld*

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