



### CERTIFICATE OF SERVICE

I, Heather Campbell, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief for the Republican National Committee as *Amicus Curiae* in Support of Petitioners in 21-248, *Philip E. Berger, et al. v. North Carolina State Conference of the NAACP, et al.*, were sent via Two Day Service to the U.S. Supreme Court, and 3 copies via Two Day and e-mail service to the following parties listed below, this 18th day of January, 2022:

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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 January 18, 2022.

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

Date: January 18, 2022

John D. Gallagher  
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[seal]



JOHN D. GALLAGHER  
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February 14, 2023