



### CERTIFICATE OF SERVICE

I, Heather Campbell, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Reply Brief for Petitioners in 21-312 *Volkswagen Aktiengesellschaft, et al. v. State of Ohio ex rel. Dave Yost, Ohio Attorney General* were sent via Next Day Service to the U.S. Supreme Court, and 3 copies were sent via Next Day and e-mail service to the following parties listed below, this 26th day of October, 2021:

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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 October 26, 2021.

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

Date: October 26, 2021

John D. Gallagher  
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[seal]



**JOHN D. GALLAGHER**  
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My Commission Expires  
February 14, 2023