



CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Brief of the American Planning Association as *Amicus Curiae* in Support of Neither Party in 22-1074, *George Sheetz v. County of El Dorado, California*, were sent via Two Day Service to the U.S. Supreme Court, and 3 copies were sent via Two Day Service and e-mail to the following parties listed below, this 20th day of November, 2023:

Paul J. Beard II
FisherBroyles LLP
4470 W. Sunset Blvd., Suite 93165
Los Angeles, CA 90027
(818) 216-3988
paul.beard@fisherbroyles.com

Counsel for Petitioner

Aileen Marie McGrath
Akin Gump Strauss Hauer & Feld LLP
100 Pine Street, Suite 3200
San Francisco, CA 94111
(415) 765-9553
AMcGrath@akingump.com

Glen Calvin Hansen
Abbott & Kindermann, Inc.
2100 21st Street, Ste. A
Sacramento, CA 95818
(916) 456-9595
ghansen@aklandlaw.com

Counsel for Respondent

BRIAN J. CONNOLLY
Counsel of Record
UNIVERSITY OF MICHIGAN
STEPHEN M. ROSS SCHOOL OF BUSINESS
701 Tappan Avenue
Ann Arbor, Michigan 48109
(734) 763-8636
cobrian@umich.edu

JOHN M. BAKER
KATHERINE M. SWENSON
GREENE ESPEL PLLP
222 S. 9th Street, Suite 2200
Minneapolis, Minnesota 55402
(612) 373-0830
jbaker@greeneespel.com
kswenson@greeneespel.com

Counsel for Amicus Curiae

All parties required to be served have been served.

State of Ohio
County of Hamilton

I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on November 20, 2023.

Donna J. Moore
Donna J. Moore
Becker Gallagher Legal Publishing, Inc.
8790 Governor's Hill Drive, Suite 102
Cincinnati, OH 45249
(800) 890-5001

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

Date: November 20, 2023

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2028