

IN THE
Supreme Court of the United States

WENDY SMITH, ET AL.,

Petitioners,

v.

KEITH SPIZZIRRI, ET AL.,

Respondents.

**On Writ of Certiorari to the United States
Court of Appeals for the Ninth Circuit**

CERTIFICATE OF SERVICE

I, Jeffrey R. White, attorney for Amicus Curiae, hereby certify on this 4th day of March 2024, that three true and correct copies of the foregoing Amicus Curiae Brief of American Association for Justice in Support of Neither Party have been delivered via United Parcel Service two-day delivery to the following Counsel of Record:

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