



CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Brief of the Michigan Association of Counties and the Michigan Association of County Treasurers as *Amici Curiae* in Support of Respondents in 22-166, *Geraldine Tyler v. Hennepin County, Minnesota, et al.*, 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 5th day of April, 2023:

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All parties required to be served have been served.

State of Ohio
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I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on April 5, 2023.



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

Date: April 5, 2023



Notary Public

[seal]



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