



CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief *Amicus Curiae* of California Rental Housing Association, Southern California Rental Housing Association, and Western Manufactured Housing Communities Association in Support of Petitioners in 22-181, *Resurrection School, et al. v. Elizabeth Hertel, Director, Michigan Department of Health and Human Services, 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 28th day of September, 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 September 28, 2022.

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

Date: September 28, 2022

Bianca Becker

Notary Public

[seal]



BIANCA BECKER
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My Commission Expires
February 14, 2023