



CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Brief of Local Government Legal Center, National Association of Counties, National League of Cities, and the International Municipal Lawyers Association as *Amici Curiae* In Support of Neither Party in No. 22-324, *Michelle O'Connor-Ratcliff, et al. v. Christopher Garnier, et ux.*, were sent via Next Day Service to the U.S. Supreme Court, and 3 copies were sent via Next Day Service and e-mail to the following parties listed below, this 30th day of June, 2023:

Hashim M. Mooppan
Jones Day
51 Louisiana Avenue, NW
Washington, DC 20001
(202) 879-3939
hmmooppan@jonesday.com

Counsel for Petitioners

Cory Jay Briggs
Briggs Law Corporation
99 East C Street
Suite 111
Upland, CA 91786
(909) 949-7115
cory@briggslawcorp.com

Counsel for Respondents

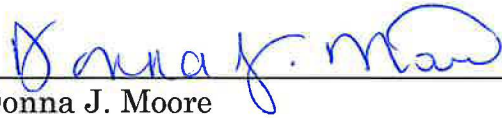
Caroline P. Mackie
Counsel of Record
Robert E. Hagemann
Andrea M. Liberatore
Rohun S. Shah
P.O. Box 1801
Raleigh, NC 27602-1801
Telephone: 919.783.6400
Facsimile: 919.783.1075
cmackie@poynerspruill.com
rhagemann@poynerspruill.com
aliberatore@poynerspruill.com
rshah@poynerspruill.com

*Counsel for Amici Curiae Local Government Legal
Center, National Association of Counties, National
League of Cities, and the International Municipal
Lawyers Association*

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 June 30, 2023.



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: June 30, 2023

John D. Gallagher
Notary Public

[seal]



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