



CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Brief of Protect the First Foundation as *Amicus Curiae* Supporting Respondents in No. 22-324, *Michelle O'Connor-Ratcliff, et al. v. Christopher Garnier, et ux.*, 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 15th day of August, 2023:

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All parties required to be served have been served.

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I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on August 15, 2023.

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

Date: August 15, 2023

John D. Gallagher
Notary Public

[seal]



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