



CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Brief of *Amici Curiae* Professors Thomas R. Lee, Kevin Tobia, and Jesse Egbert in Support of Neither Party in 22-340, *Mark E. Pulsifer v. United States of America*, 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 26th day of May, 2023:

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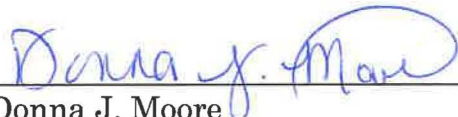
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All parties required to be served have been served.

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I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on May 26, 2023.



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

Date: May 26, 2023



Notary Public

[seal]



JOHN D. GALLAGHER
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My Commission Expires
February 14, 2028