



## CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing *Amicus Curiae* Brief of the Buckeye Institute in Support of Respondent in 22-976, *Merrick B. Garland, Attorney General, et al. v. Michael Cargill*, were sent via Two Day Service to the U.S. Supreme Court, and 3 copies were sent Two Day Service and e-mail to the following parties listed below, this 23rd day of January, 2024:

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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 January 23, 2024.

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

Date: January 23, 2024  
John D. Gallagher  
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[seal]



JOHN D. GALLAGHER  
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My Commission Expires  
February 14, 2028