



CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Brief of *Amici Curiae* Former Government Officials and Constitutional Lawyers in Support of Respondent in 23-5572, *Joseph W. Fischer v. United States*, 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 6th day of March, 2024:

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All parties required to be served have been served.

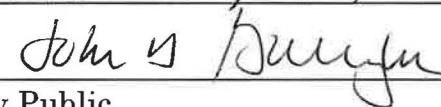
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I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on March 6, 2024.



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

Date: March 6, 2024


Notary Public

[seal]



JOHN D. GALLAGHER
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My Commission Expires
February 14, 2028