



CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Brief of Kentucky, Alabama, Arkansas, Idaho, Iowa, Mississippi, Missouri, Montana, Nebraska, South Carolina, Tennessee, Texas, Utah, and West Virginia as *Amici Curiae* Supporting Petitioner in 23-74, *Debra A. Vitagliano v. County of Westchester, New York*, 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 24th day of August, 2023:

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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 August 24, 2023.

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

Date: *August 24, 2023*

John D. Gallagher
Notary Public

[seal]



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