



CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Brief of *Amicus Curiae* The Buckeye Institute in Support of Petitioners in 23-926, *No on E, San Franciscans Opposing the Affordable Care Housing Production Act, et al. v. David Chiu, in His Official Capacity as San Francisco City Attorney, et al.*, 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 28th day of March, 2024:

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All parties required to be served have been served.

State of Ohio
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I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on March 28, 2024.

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

Date: *March 28, 2024*
John D. Gallagher
Notary Public

[seal]



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