



CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Brief for Former White House Chief of Staff Mark R. Meadows as *Amicus Curiae* in Support of Neither Party in 23-939, *Donald J. Trump v. United States*, were sent via Two Day Service to the U.S. Supreme Court, and 3 copies were sent via Two Day Service and e-mail to the following parties listed below, this 19th 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 19, 2024.

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

Date: March 19, 2024
John D. Gallagher
Notary Public

[seal]



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