

No. 23-939

Certificate of Compliance and Service

I, Thomas Ogden, filed the attached Amicus Brief in Support of Respondent and hereby certify that the brief is less than 1,500 words in total and was written in Century 12 pt. font.

I further certify that the Petitioner and Respondent in this matter were served with copies of this brief via US first-class mail and email, as follows:

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