

In the Supreme Court of the United States

TURTLE MOUNTAIN BAND OF CHIPPEWA INDIANS, ET AL.,

Petitioners,

v.

MICHAEL HOWE, IN HIS OFFICIAL CAPACITY AS
SECRETARY OF STATE OF NORTH DAKOTA,

Respondent.

CERTIFICATE OF SERVICE

I, Charles A. Rothfeld, counsel for *Amici* Voting Rights Historians and a member of the Bar of this Court, certify that on this 6th day of October, 2025, I caused three copies of the Brief of Voting Rights Historians as *Amici Curiae* In Support of Petitioners to be served by overnight mail, and a copy to be served by electronic means on the following:

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I further certify that all parties required to be served have been served.

/s/ Charles A. Rothfeld

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