

IN THE SUPREME COURT OF THE UNITED STATES

No. 25-464

PHILIP G. POTTER , *Petitioner*,

v.

INCORPORATED VILLAGE OF OCEAN BEACH, *et al.*, *Respondents*.

CERTIFICATE OF SERVICE

I, Richard Samp, counsel for *amicus curiae* The New Civil Liberties Alliance (NCLA) and a member of the Bar of this Court, hereby certify that on this 17th day of November, 2025, three copies of the brief of NCLA as *amicus curiae* in support of Petitioner were sent via U.S. mail to the following:

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I further certify that electronic copies of the brief were emailed to each of the individuals listed above and that all parties required to be served have been served.

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