

## PROOF OF SERVICE

I, Frederick W. Claybrook, Jr., a member of the bar of this Court, hereby certify that on the 6th day of February, 2026, three (3) copies of the Brief *Amicus Curiae* of the National Legal Foundation, supporting Petitioners in No. 25-802, *Foothills Christian Ministries, et al. v. Kim Johnson, et al.*, were served by first-class mail, postage pre-paid, on the following:

Kevin T. Snider  
Counsel of Record for Petitioners  
Pacific Justice Institute  
P.O. Box 276600  
Sacramento, CA 95827-6600

Joshua A. Klein  
Counsel of Record for Respondents  
California Department of Justice  
1515 Clay Street  
Suite 2000  
Oakland, CA 94612-1413

/s/ Frederick W. Claybrook, Jr.  
FREDERICK W. CLAYBROOK, JR.  
*Counsel of Record*  
CLAYBROOK LLC  
655 Fifteenth St., NW, Ste. 425  
Washington, D.C. 20005  
(301) 622-0360  
rick@claybrooklaw.com