

No. 25-965

DANIEL GRAND, *Petitioner*,

v.

CITY OF UNIVERSITY HEIGHTS, OHIO, ET AL.

CERTIFICATE OF SERVICE

I, Erik S. Jaffe, a member of the Bar of this Court, hereby certify that on September 7, 2026, the BRIEF OF *AMICUS CURIAE* PROTECT THE FIRST FOUNDATION SUPPORTING PETITIONER was submitted to the Court's electronic filing system. Pursuant to U.S. Supreme Court Rule 29.3, at the time of filing all parties to the proceeding were served with an electronic copy; three paper copies will also be served by third-party commercial carrier for delivery within 3 calendar days, on the following:

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