

CERTIFICATE OF SERVICE

No. 26-193

Bethany M. Hall

Petitioner,

v.

Scott Fleming

Respondents.

I am counsel of record for Amicus Curiae Heritage Foundation and certify that, on the undersigned date, I e-filed the HERITAGE FOUNDATION AMICUS BRIEF. Per the provisions of Rule 29 .2, within 3 days, I intend to mail, via my printing partner Supreme Court Press, 40 books to the Court and 3 books to the service parties listed below, which I aver constitute all parties required to be served.

Steven Werner Fitschen
National Legal Foundation
524 Johnstown Rd
Chesapeake, VA 23322
757-463-6133

sfitschen@nationallegalfoundation.org
Counsel for Bethany Hall

Tillman J. Breckenridge
Office, Attorney General of Virginia
202 North 9th Street
Richmond, VA 23219
804-786-7704

tbreckenridge@oag.state.va.us
Counsel for A. Scott Fleming

/s/ Jonathan F. Mitchell

Jonathan F. Mitchell
Mitchell Law PLLC
111 Congress Avenue, Suite 400
Austin, TX 78701
(512) 686-3940
jonathan@mitchell.law

September 14, 2026