

In the Supreme Court of the United States

AMERICANS FOR CITIZEN VOTING – MICHIGAN AND FRED SMITH, APPLICANTS

V.

MICHIGAN BOARD OF STATE CANVASSERS, SECRETARY OF STATE JOCELYN BENSON, AND
DIRECTOR OF ELECTIONS JONATHAN BRATER, RESPONDENTS

**PROOF OF SERVICE REGARDING
RESPONSE IN OPPOSITION TO EMERGENCY INJUNCTION
PENDING APPEAL BY SEPTEMBER 1, 2026**

The undersigned certifies that on September 2, 2026, she served the **Response in Opposition to Emergency Injunction Pending Appeal by September 1, 2026** by emailing to the email address provided below. Paper service will be mailed by Wilson-Epes Printing Co., Inc., 1115 H ST NE #101, Washington DC 20002, (202) 789-0096, www.wilsonepes.com.

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/s/ Holly Gustafson
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