

## CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Reply Brief of Petitioners in 23-862, West Flagler Associates, Ltd., et al. v. Debra Haaland, et al., were sent via Next Day Service to the U.S. Supreme Court, and 3 copies were sent via Next Day Service and e-mail to the following parties listed below, this 21st day of May, 2024:

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All parties required to be served have been served.

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I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on May 21, 2024.

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Subscribed and sworn to before me by the said Affiant on the date below designated.

Date: 5.21-707

Notary Public

[seal]

DOUGLAS S. MOORE
Notary Public, State of Ohio
My Commission Expires
December 18, 2027