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STATE OF NEW YORK,            )  
  )  
COUNTY OF NEW YORK        )

SS:

**AFFIDAVIT OF SERVICE**

Edward Gutowski being duly sworn, deposes and says that deponent is not party to the action, and is over 18 years of age.

That on the 8th day of April 2024 deponent served 3 copies of the within  
**BRIEF FOR AMICUS CURIAE COMMON CAUSE**  
**IN SUPPORT OF RESPONDENT**

upon the attorneys at the addresses below, and by the following method:

**BY FEDERAL EXPRESS NEXT BUSINESS DAY DELIVERY**

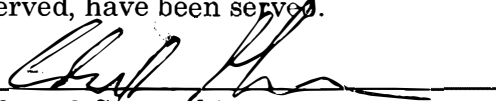
D. John Sauer  
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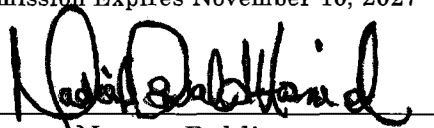
I, Edward Gutowski, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, executed on April 8, 2024, pursuant to Supreme Court Rule 29.5(c). All parties required to be served, have been served.

  
Edward Gutowski

**Sworn to me this**

April 8, 2024

NADIA R. OSWALD HAMID  
Notary Public, State of New York  
No. 01OS6101366  
Qualified in Kings County  
Commission Expires November 10, 2027

  
Notary Public

**Case Name:**  
Donald J. Trump v. United States

**Docket/Case No.** 23-939