



April 27, 2020

ILYA SHAPIRO
Director
ROBERT A. LEVY CENTER FOR
CONSTITUTIONAL STUDIES

Scott Harris
Clerk of the U.S. Supreme Court
One First St., NE
Washington, DC 20543

Re: No. 19-1123, *Lech v. Jackson*

Dear Mr. Harris,

It has come to my attention that the *amicus curiae* brief I filed on behalf of the Cato Institute on April 15 in the above-referenced case contains an error in the description of one of the cases cited. On page 8, the discussion of *Respublica v. Sparhawk*, 1 U.S. (1 Dall.) 357 (1788), refers to the case as having been decided by “this Court.” Of course, the U.S. Supreme Court didn’t yet exist in 1788. *Sparhawk* was decided by the Pennsylvania Supreme Court, in a period when the United States Reports printed decisions from various lower courts.

Accordingly, “this Court” should be replaced by “the Pennsylvania Supreme Court.” My sincere apologies for the oversight.

Cordially,

Ilya Shapiro/SS

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