

No. 19-435

IN THE SUPREME COURT OF THE UNITED STATES

SIH PARTNERS LLLP, EXPLORER CORPORATION, PETITIONER  
v.

COMMISSIONER OF INTERNAL REVENUE

**CERTIFICATE OF SERVICE**

It is hereby certified that all parties required to be served have been served with copies of the **BRIEF FOR THE RESPONDENT IN OPPOSITION**, via email and first-class mail, postage prepaid, this 2nd day of December, 2019.

[See Attached Service List]

As required by Supreme Court Rule 33.1(h), I certify that the document contains 7975 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 2, 2019.

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Noel J. Francisco  
Solicitor General  
Counsel of Record  
Department of Justice  
Washington, D.C. 20530-0001  
(202) 514-2217

December 2, 2019

Due to the continuing delay in receiving incoming mail at the Department of Justice, in addition to mailing your brief via first-class mail, we would appreciate a fax or email copy of your brief. If that is acceptable to you, please fax your brief to Charlene Goodwin, Supervisor, Case Management Specialist, Office of the Solicitor General, at (202) 514-8844, or email at [SupremeCtBriefs@USDOJ.gov](mailto:SupremeCtBriefs@USDOJ.gov). Ms. Goodwin's phone number is (202) 514-2217 or 2218. Thank you for your consideration of this request.

19-0435

SIH PARTNERS LLLP, EXPLORER CORPORATION  
COMMISSIONER OF INTERNAL REVENUE

THOMAS H. DUPREE, JR.  
GIBSON, DUNN & CRUTCHER LLP  
1050 CONNECTICUT AVENUE NW  
WASHINGTON, DC 20036  
202-955-8500  
[TDUPREE@GIBSONDUNN.COM](mailto:TDUPREE@GIBSONDUNN.COM)