

E-Mail Address: briefs@wilsonepes.com

Web Site: www.wilsonepes.com

1115 H Street, N.E. Washington, D.C. 20002

> Tel (202) 789-0096 Fax (202) 842-4896

No. 22-___

OAKBROOK LAND HOLDINGS, LLC, WILLIAM DUANE HORTON, Tax Matters Partner,

Petitioner,

υ.

COMMISSIONER OF INTERNAL REVENUE,

Respondent.

AFFIDAVIT OF SERVICE

I HEREBY CERTIFY that on October 4, 2022, three (3) copies of the PETITION FOR WRIT OF CERTIORARI in the above-captioned case were served, as required by U.S. Supreme Court Rule 29.5(c), on the following:

NATHANIEL S. POLLOCK FRANCESCA UGOLINI ARTHUR T. CATTERALL UNITED STATES DEPARTMENT OF JUSTICE P.O. Box 502 Washington, DC 20044 (202) 514-3139

ELIZABETH B. PRELOGAR Solicitor General UNITED STATES DEPARTMENT OF JUSTICE 950 Pennsylvania Ave., NW Washington, DC 20530 (202) 514-2217

The following email addresses have also been served electronically:

Nathaniel.S.Pollock@usdoj.gov SupremeCtBriefs@usdoj.gov david.foster@skadden.com armando.gomez@skadden.com

ALAN SMITH

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1115 H Street, N.E.

Washington, D.C. 20002

(202) 789-0096

Sworn to and subscribed before me this 4th day of October 2022.

COLIN CASEY HOGAN NOTARY PUBLIC

District of Columbia

My commission expires June 14, 2027.