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September 20, 2023

Clerk
Supreme Court of the United States
1 First Street N.E.
Washington, DC 20543

Re: *Sauk-Suiattle Indian Tribe v. City of Seattle*, No. 22-955

Honorable Clerk:

Please note that I bring to the Court's attention the August 16, 2023 decision of the United States Court of Appeals for the Fifth Circuit in *Spivey v. Chitimacha Tribe of Louisiana*, No. 22-30436 (Aug. 16, 2023).

Sincerely,

S/ Jack W. Fiander

Attorney at Law
Counsel for Petitioner
Sauk-Suiattle Indian Tribe

cc: K Vander Stoep
Counsel for Respondent
City of Seattle

Thank you for allowing us to assist you.
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