

No. 23-146

IN THE SUPREME COURT OF THE UNITED STATES

THOMAS A. CONNELLY, PETITIONER

v.

INTERNAL REVENUE SERVICE

CERTIFICATE OF SERVICE

It is hereby certified that all parties required to be served have been served with copies of the **BRIEF FOR THE UNITED STATES IN OPPOSITION**, via email and first-class mail, postage prepaid, this 30th day of October 2023.

[See Attached Service List]

As required by Supreme Court Rule 33.1(h), I certify that the document contain **5,472** 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 **October 30, 2023**

Elizabeth B. Prelogar
Solicitor General
Counsel of Record
Department of Justice
Washington, D.C. 20530-0001
(202) 514-2217

October 30, 2023

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, Case Management Supervisor, Office of the Solicitor General, at (202) 514-8844, or email at **SupremeCtBriefs@USDOJ.gov**. Ms. Goodwin's phone number is (202) 514-2217 or 2218. Thank you for your consideration of this request.

23-0146

CONNELLY, THOMAS A., AS EXECUTOR OF THE
ESTATE OF MICHAEL P. CONNELLY, SR.
INTERNAL REVENUE SERVICE

ROBERT L. DEVEREUX
AEGIS LAW
601 SOUTH LINDBERGH BOULEVARD
ST. LOUIS , MO 63131

KANNON K. SHANMUGAM
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
2001 K STREET, NW
WASHINGTON, DC 20006
202-223-7300
KSHANMUGAM@PAULWEISS.COM