

November 9, 2023

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**VIA ELECTRONIC FILING AND FIRST-CLASS MAIL**

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

**Re:     *David Harris v. American Accounting Association, et al.***  
**No. 23-478**  
**Our File No.: 16314.00189**

Dear Mr. Harris:

I am a member of the Bar of the Supreme Court of the United States, and this firm represents Respondent American Accounting Association (“the Association”) in connection with the above petition for a writ of certiorari. We write to respectfully inform the Court that, because further review by the Supreme Court is so plainly unwarranted in this case, the Association does not intend to submit a brief in opposition to the petition unless one is requested by the Court.

Thank you for the Court’s consideration of the foregoing.

Respectfully submitted,

**WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP**

[paper filing contains ink signature]

Andrew S. Holland

cc:     David Harris (via first-class mail and email)  
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Zachary Rhines, AAG (via first-class mail and email)  
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