RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 23-914

DIANE ZILKA,

Petitioner,

v.

TAX REVIEW BOARD CIT OF PHILADELPHIA,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Carter G. Phillips, certify that the Supplemental Brief Of Petitioner in the foregoing case contains 2,234 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 23, 2024.

/s/ Carter G. Phillips CARTER G. PHILLIPS SIDLEY AUSTIN LLP 1501 K Street, N.W. Washington, DC 20005 (202) 736-8000

CERTIFICATE OF SERVICE

No. 23-914

DIANE ZILKA,

Petitioner,

v.

TAX REVIEW BOARD CIT OF PHILADELPHIA,

Respondent.

I, Carter G. Phillips, do hereby certify that, on this twenty-third day of December, 2024, I caused three copies and an electronic copy of the Supplemental Brief Of Petitioner in the foregoing case to be served by first class mail, postage prepaid, and by email, on the following parties:

CRAIG RANDALL GOTTLIEB CITY OF PHILADELPHIA LAW DEP'T 1515 Arch Street Philadelphia, PA 19102 (609) 828-3411 craig.gottlieb@phila.gov

ELIZABETH B. PRELOGAR
SOLICITOR GENERAL
UNITED STATES DEPARTMENT OF
JUSTICE
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
(202) 514-2217
supremectbriefs@usdoj.gov

Counsel for Respondent

Counsel for United States

/s/ Carter G. Phillips CARTER G. PHILLIPS SIDLEY AUSTIN LLP 1501 K Street, N.W. Washington, DC 20005 (202) 736-8000