

AFFIDAVIT OF SERVICE

SUPREME COURT OF THE UNITED STATES

No. 163, Original

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FLORIDA,

Plaintiff,

v.

CALIFORNIA AND FRANCHISE TAX BOARD OF CALIFORNIA,
Defendants.

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STATE OF NEW YORK)

COUNTY OF NEW YORK)

I, Julie Connor, being duly sworn according to law and being over the age of 18, upon my oath depose and say that:

I am retained by Counsel of Record for *Amicus Curiae.*

That on the 31st day of December, 2025, I served the within Brief of American College of Tax Counsel as *Amicus Curiae* in Support of Plaintiff's Motion for Leave to File a Bill of Complaint in the above-captioned matter upon:

Jeffrey Paul DeSousa
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Counsel for Defendants

by sending three copies of same, addressed to each individual respectively, through U.S.P.S. Priority Mail. An electronic version was also served by email to each individual.

That on the same date as above, I sent to this Court forty copies of the within *Brief for Amicus Curiae* through the Next Day Federal Express, postage prepaid. In addition, the brief has been submitted through the Court's electronic filing system.

All parties required to be served have been served.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 31st day of December, 2025.

Julie Connor

Julie Connor

Sworn to and subscribed before me
this 31st day of December, 2025.

Mariana Braylovskiy

MARIANA BRAYLOVSKIY
Notary Public State of New York
No. 01BR6004935
Qualified in Richmond County
Commission Expires March 30, 2026