

CERTIFICATE OF SERVICE  
No. 220163

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IN THE  
**Supreme Court of the United States**

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FLORIDA, *Plaintiff*,  
v.  
CALIFORNIA AND  
FRANCHISE TAX BOARD OF CALIFORNIA, *Defendants*.

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I, Joseph D. Henchman, do hereby certify that on January 2, 2026, three copies of the Brief of *Amicus Curiae* National Taxpayers Union Foundation in Support of Motion for Leave to File in the above-entitled case were mailed, first class postage prepaid to:

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I further certify that all parties required to be served have thereby been served.



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