

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

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STATE OF FLORIDA,

*Petitioner,*

v.

STATE OF CALIFORNIA AND FRANCHISE TAX BOARD OF  
CALIFORNIA,

*Respondent.*

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**BRIEF IN OPPOSITION**

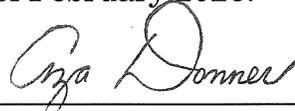
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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains **7,854** 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.

Sworn to and subscribed before me this 27th day of February 2026.



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AZA SALINDER DONNER  
NOTARY PUBLIC  
District of Columbia

My commission expires April 30, 2029.

