

No. 25-1163
IN THE
Supreme Court of the United States

CARLOS PENA,
Petitioner,

v.

CITY OF LOS ANGELES, CALIFORNIA,
Respondent.

CERTIFICATE OF SERVICE

I, Sarah M. Konsky, hereby certify that I am a member of the Bar of this Court, and that I have this 11th day of May 2026, caused three copies of the Brief of Leo Lech, Kimberly Layson, and Stephen Ranieri as *Amici Curiae* in Support of Petitioner to be served via overnight mail and an electronic version of this document to be transmitted via the Court's electronic filing system and email to:

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