

**AFFIDAVIT OF SERVICE**

SUPREME COURT OF THE UNITED STATES

No. 25-1163

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CARLOS PENA,

*Petitioner,*

*v.*

CITY OF LOS ANGELES, CALIFORNIA,

*Respondent.*

-----X

STATE OF NEW YORK            )

COUNTY OF NEW YORK        )

I, Nikolina Gurfinkel, 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* Chief Thomas J. Tiderington.

That on the 11<sup>th</sup> day of May, 2026, I served the within **BRIEF OF CHIEF THOMAS J. TIDERINGTON AS AMICUS CURIAE IN SUPPORT OF PETITIONER** in the above-captioned matter upon:

Jeffrey Hallett Redfern  
*Counsel of Record*  
Institute for Justice  
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*Counsel for Petitioner*  
*Carlos Pena*

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*Counsel for Respondent*  
*City of Los Angeles*

by sending three copies of same, addressed to each individual respectively, and enclosed in a properly addressed wrapper, through the United States Postal Service Priority Mail, postage prepaid. 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 OF CHIEF THOMAS J. TIDERINGTON AS AMICUS CURIAE IN SUPPORT OF PETITIONER** through USPS Express Mail Service. In addition, the petition 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 11<sup>th</sup> day of May, 2026.

  
\_\_\_\_\_  
Nikolina Gurfinkel

Sworn to and subscribed before me  
this 11<sup>th</sup> day of May, 2026.



**MARIANA BRAYLOVSKIY**  
Notary Public State of New York  
No. 01BR6004935  
Qualified in Richmond County  
Commission Expires March 30, 2030

