

**In the Supreme Court of the United States**

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UNITED STATES OF AMERICA AND STATE OF MICHIGAN EX REL. ERIK OLSEN, M.D.,  
WILLIAM BERK, M.D., AND SAJITH MATTHEWS, M.D.,

*Petitioners,*

v.

TENET HEALTHCARE CORPORATION; DETROIT MEDICAL CENTER,

*Respondents.*

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On Petition for a Writ of Certiorari to the  
United States Court of Appeals for the Sixth Circuit

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**CERTIFICATE OF SERVICE**

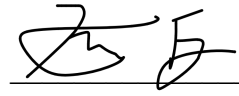
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I, Kathleen Foley, a member of the Bar of this Court, hereby certify pursuant to Rules 29.3 and 29.5 on this 24th day of October, 2025, that I have caused a copy of the Brief of the American Academy of Emergency Medicine and the American College of Emergency Physicians as Amici Curiae in Support of the Petition in the above-captioned case to be mailed, first class postage prepaid, to counsel of record for the petitioners and respondents at the following addresses:

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As required by Rule 29.3, an electronic version is being transmitted to counsel at the email addresses listed above.

A handwritten signature in black ink, appearing to be 'KF' or similar, positioned above a horizontal line.

Kathleen Foley