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No. 25-365

DONALD J. TRUMP, ET AL.,

*Petitioners,*

v.

BARBARA, ET AL.,

*Respondents.*

### AFFIDAVIT OF SERVICE

I HEREBY CERTIFY that on January 27, 2026, three (3) copies of the BRIEF OF KIRKWOOD INSTITUTE, INC., AND LEGAL SCHOLARS HANS A. VON SPAKOVSKY & AMY E. SWEARER AS AMICI CURIAE IN SUPPORT OF RESPONDENT in the above-captioned case were served, as required by U.S. Supreme Court Rule 29.5(c), on the following:

D. JOHN SAUER  
*Solicitor General*  
UNITED STATES DEPARTMENT OF JUSTICE  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001  
(202) 514-2217

*Party name: Donald J. Trump, President of  
the United States, et al.*

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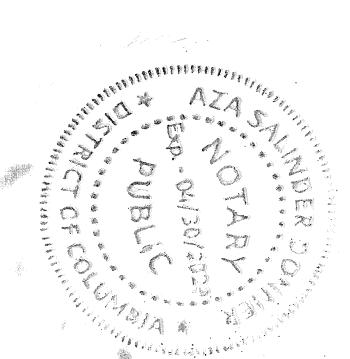
*Party name: Barbara, et al.*

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



AZA SALINDER DONNER  
NOTARY PUBLIC  
District of Columbia

My commission expires April 30, 2029.