



E-Mail Address:  
briefs@wilsonepes.com

1115 H Street, N.E.  
Washington, D.C. 20002

Web Site:  
www.wilsonepes.com

Tel (202) 789-0096  
Fax (202) 842-4896

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 PETITIONERS in the above-captioned case were served. A corrected brief was submitted on February 2, 2026, and 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.*

CODY HIRT WOFSY

AMERICAN CIVIL LIBERTIES UNION FOUNDATION  
425 California St.  
7th Floor  
San Francisco, CA 94104  
(415) 343-0785

*Party name: Barbara, et al.*

The following email addresses have also been served electronically:

alan.ostergren@kirkwoodinstitute.org

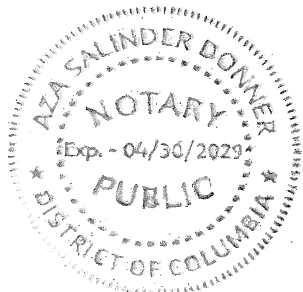
alan.ostergren@ostergrenlaw.com

supremectbriefs@usdoj.gov

cwofsy@aclu.org

\_\_\_\_\_  
ROBYN DORSEY WILLIS  
WILSON-EPES PRINTING CO., INC.  
1115 H Street, N.E.  
Washington, D.C. 20002  
(202) 789-0096

Sworn to and subscribed before me this 2nd day of February 2026.



\_\_\_\_\_  
AZA SALINDER DONNER  
NOTARY PUBLIC  
District of Columbia

My commission expires April 30, 2029.