

**AFFIDAVIT OF SERVICE**

SUPREME COURT OF THE UNITED STATES

No. 25-377

-----X

NORTH AMERICAN CREDIT SERVICES, INC.,  
*Petitioner,*

*v.*

ABDUL CRAWFORD,  
*Respondent.*

-----X

STATE OF NEW YORK )

COUNTY OF NEW YORK )

I, Julie Connor, 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*.

That on the 29th day of October, 2025, I served the within Brief of *Amicus Curiae* ACA International in Support of Petitioner in the above-captioned matter upon:

Ernest Henry Kohlmyer III  
Zimmerman, Kiser & Sutcliffe, P.A.  
315 E. Robinson Street, Suite 600  
Orlando, FL 32871  
(407) 425-7010  
skohlmyer@zkslaw.com  
*Counsel for Petitioner*

Scott D. Owens  
Scott D. Owens, PA  
2750 N 29th Ave., Ste., # 209A  
Hollywood, CA 33020  
(954) 589-0588  
scott@scottdowens.com  
*Counsel for Respondent Abdul Crawford*

by sending three copies of same, addressed to each individual respectively, through FedEx Overnight Mail. 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 for Amicus Curiae* through the Overnight Federal Express, postage prepaid. In addition, the brief 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 29th day of October, 2025.

*Julie Connor*

---

Julie Connor

Sworn to and subscribed before me  
this 29th day of October, 2025.

*Mariana Braylovskiy*

**MARIANA BRAYLOVSKIY**  
Notary Public State of New York  
No. 01BR6004935  
Qualified in Richmond County  
Commission Expires March 30, 2026