AFFIDAVIT OF SERVICE

SUPREME COURT OF THE UNITED STATES

No. 25-378	X
DONALD OLSEN,	
Peti	tioner,
v.	
AARON SALTER,	
Res_{I}	pondent,
	X
STATE OF NEW YORK)
COUNTY OF NEW YORK)
I Ann Togal haing duly	y awarn according to law and being over the ago

I, Ann Tosel, 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 30th day of October, 2025, I served the within *Brief of Amicus* Curiae International Municipal Lawyers Association In Support of Petitioner in the above-captioned matter upon:

Mary Massaron Counsel of Record Plunkett & Cooney, P.C. 38505 Woodward Ave Suite 100 Bloomfield Hills, MI 48304 mmassaron@plunkettcooney.com Ph: 313-983-4801

Mark Granzotto Counsel of Record Granzotto & Wittmann, P.C. 2684 West Eleven Mile, Suite 100 Berkley, MI 48072 tish@granzottolaw.com Ph: 2485464649

by sending three copies of same, addressed to each individual respectively, through Priority 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 of Amicus Curiae International Municipal Lawvers Association In Support of Petitioner through the Overnight Next Day 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 30th day of October, 2025.

Ann Tosel

Ann Tosel

Sworn to and subscribed before me this 30th day of October, 2025.

MARIANA BRAYLOVSKIY

Notary Public State of New York

Mariana Braylovsby

No. 01BR6004935

Qualified in Richmond County

Commission Expires March 30, 2026