AFFIDAVIT OF SERVICE

SUPREME COURT OF THE UNITED STATES No. -----X FAYTIMA HOWARD, Petitioner, v. MACOMB COUNTY, Respondent, -----X STATE OF NEW YORK) COUNTY OF NEW YORK) 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 *Petitioner*.

That on the 10th day of October, 2025, I served the within *Petition for a* Writ of Certiorari in the above-captioned matter upon:

Counsel for Respondent

Frank Krycia Macomb County Corp. Counsel 1 S. Main St., 8th Floor Mount Clemens, MI 48043-2306 586-469-6346

Served pursuant to 28 U.S.C. § 2403(b)

Dana Nessel Attorney General Department of Attorney General 525 W. Ottawa St. Lansing, MI 48943 (517) 335-7622 miag@michigan.gov

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 *Petition for a Writ of Certiorari* and three hundred dollar filing fee check 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 10th day of October, 2025.

Ann Tosel

Ann Tosel

Sworn to and subscribed before me this 10th day of October, 2025.

Mariana Braylovsby

MARIANA BRAYLOVSKIY

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