

AFFIDAVIT OF SERVICE

SUPREME COURT OF THE UNITED STATES

No. 25-451

-----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 22nd day of December, 2025, I served the within *Reply In Support of 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
frank.krycia@macombgov.org
586-469-6346

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 *Reply In Support of Petition for a Writ of Certiorari* 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 22nd day of December, 2025.



Ann Tosel

Sworn to and subscribed before me
this 22nd day of December, 2025.



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

