

**AFFIDAVIT OF SERVICE**

SUPREME COURT OF THE UNITED STATES

No. 25-612

-----X

SCOT VAN OUDENHOVEN,

*Petitioner,*

*v.*

WISCONSIN DEPARTMENT OF JUSTICE,

*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 2<sup>nd</sup> day of February, 2026, I served the within *Reply In Support of Petition for Certiorari* in the above-captioned matter upon:

Brian Patrick Keenan  
*Counsel of Record*  
Wisconsin Department of Justice  
17 W Main Street, P.O. Box 7857  
Madison, WI 53703  
brian.keenan@wisdoj.gov  
Ph: 6082660020

by sending three copies of same, addressed to each individual respectively, through the United States Postal Service Express 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 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 2<sup>nd</sup> day of February, 2026.

*Ann Tosel*

---

Ann Tosel

Sworn to and subscribed before me  
this 2<sup>nd</sup> day of February, 2026.

*Mariana Braylovsky*

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

