

## AFFIDAVIT OF SERVICE

SUPREME COURT OF THE UNITED STATES

No. 25-672

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KATE ADAMS,

*Petitioner,*

*v.*

COUNTY OF SACRAMENTO; SCOTT JONES, SHERIFF,

*Respondents,*

-----X

STATE OF NEW YORK )

COUNTY OF NEW YORK )

I, Ann Tosal, 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 9<sup>th</sup> day of January, 2026, I served the within *Brief of the Manhattan Institute as Amicus Curiae In Support of Petitioner* in the above-captioned matter upon:

Andrew Timothy Tutt  
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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 the Manhattan Institute as Amicus Curiae 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.

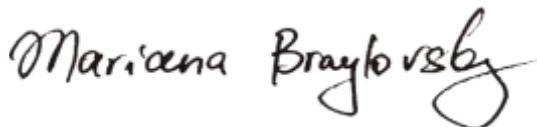
Executed on this 9<sup>th</sup> day of January, 2026.



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Ann Tosal

Sworn to and subscribed before me  
this 9<sup>th</sup> day of January, 2026.



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