

**AFFIDAVIT OF SERVICE**

SUPREME COURT OF THE UNITED STATES

No. 25-

-----X

MICHAEL HENDERSON,

*Petitioner,*

*v.*

UNITED STATES,

*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 13<sup>th</sup> day of February, 2026, I served the within *Petition for a Writ of Certiorari* and *Motion for Leave to Proceed in Forma Pauperis* in the above-captioned matter upon:

D. John Sauer  
*Counsel of Record*  
Solicitor General  
United States Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001  
supremectbriefs@usdoj.gov  
Ph: 202-514-2217

by sending one copy 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 eleven copies of the within *Petition for a Writ of Certiorari* and *Motion for Leave to Proceed in Forma Pauperis* through the United States Postal Service Priority Mail. 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.

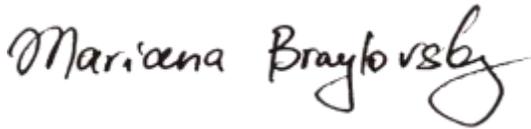
Executed on this 13<sup>th</sup> day of February, 2026.



---

Ann Tosel

Sworn to and subscribed before me  
this 13<sup>th</sup> day of February, 2026.



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

