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**In the Supreme Court of the United States**

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ROWLAND MARCUS ANDRADE, ET AL.,  
Petitioners,

*v.*

INTERNAL REVENUE SERVICE,  
Respondents.

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**CERTIFICATE OF SERVICE**

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Pursuant to S. Ct. R. 29.2, I certify that 40 copies in booklet format of the petition for writ of certiorari, and the accompanying appendices are sent to the Clerk of the United States Supreme Court through the United Parcel Service via Next Day Air postage prepaid, and were picked up by the United Parcel Service on this 15th day of December, 2025.

Lastly, I certify pursuant to S. Ct. R. 29.5(c), 3 copies of the petition for a writ of certiorari and the accompanying appendices are served upon the Solicitor General of the United States, counsel of record for respondent Internal Revenue Service, at Room 5616, Department of Justice, 950 Pennsylvania Ave., N. W., Washington, DC 20530-0001 on this 15th day

of December, 2025 through the United States Postal Service via Priority Mail postage prepaid.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 15, 2025



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Huang Tiange

*President*

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