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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,  
Respondent.

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**CERTIFICATE OF COMPLIANCE AND SERVICE**

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Pursuant to S. Ct. R. 33.1(h), I certify that the brief of Huang Tiange as *amicus curiae* in support of petitioners contains 3,717 words, excluding parts exempted by S. Ct. R. 33.1(d).

Pursuant to S. Ct. R. 29.2, I certify that 40 copies in booklet format of the brief of Huang Tiange as *amicus curiae* in support of petitioners are sent to the Clerk of the Supreme Court of the United States through the United Parcel Service via Next Day Air postage prepaid, and was placed into the United Parcel Service's possession on this 20th day of January, 2026.

Lastly, I certify pursuant to S. Ct. R. 29.5(c), 3 copies of the brief of Huang Tiange as *amicus curiae* in support of petitioners are served all parties required to be served have been served via email and United States Postal Service via Priority Mail postage prepaid, this 20th day of January, 2026.

[See attached service list]

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

Executed on January 20, 2026

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