

AFFIDAVIT OF SERVICE

SUPREME COURT OF THE UNITED STATES

No. 25-

-----X

PIMLICO, LLC,

Petitioner,

v.

COMMISSIONER OF INTERNAL REVENUE,

Respondent.

-----X

STATE OF NEW YORK)

COUNTY OF NEW YORK)

I, Melissa Pickett, 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 2nd day of February, 2026, I served the within *Petition for a Writ of Certiorari* in the above-captioned matter upon:

D. John Sauer
Solicitor General
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530-0001
(202) 514-2217
SupremeCtBriefs@usdoj.gov

by sending three copies of same, addressed to each individual respectively, through FedEx Overnight 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 *Petition for a Writ of Certiorari* and three hundred dollar filing fee check 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 2nd day of February, 2026.



Melissa Pickett

Sworn to and subscribed before me this 2nd day of February, 2026.



MARIANA BRAYLOVSKIY
Notary Public State of New York
No. 01BR6004935
Qualified in Richmond County
Commission Expires March 30, 2026
#389753