No. 25A312

In the

## Supreme Court of the United States

DONALD J. TRUMP,
President of the United States, et al.

\*Applicants,
v.

LISA D. COOK, Respondent.

## CERTIFICATE OF SERVICE

In compliance with Supreme Court Rules 29.3 and 29.5, I, Jeffrey P. DeSousa, counsel of record for Amici Curiae and a member of the Bar of this Court, certify that, on September 25, 2025, I served three copies of the Amici Curiae Brief by overnight delivery and by electronic mail to the following counsel:

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All parties required to be served have been served.

<u>/s/ Jeffrey P. DeSousa</u> Counsel of Record

September 25, 2025