

No: _____

In The
Supreme Court of the United States

THE SOCIETY OF APOSTOLIC CHURCH MINISTRIES BISHOP,
Elizabeth Gardner Corporation
Sole and Her Successors,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF SERVICE

I, Dennis I. Wilenchik, counsel of record for Petitioner The Society of Apostolic Church Ministries, hereby certify that on this 9th day of October 2025, I caused to be served three copies of the Application for Extension of Time to File Petition for Writ of Certiorari in the above-captioned matter by first-class mail, postage prepaid, addressed to the following counsel of record:

Douglas Campbell Rennie
Jennifer Marie Rubin
Amy Talburt Matchinson
Tax Division
U.S. Department of Justice
Ben Franklin Station
P.O. Box 683
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Solicitor General of the United States
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In accordance with Supreme Court Rule 29.3, I further certify that an electronic version of the Application for Extension was sent via email to the above-listed counsel at the following email addresses:

U.S. Department of Justice: appellate.taxcivil@usdoj.gov
Douglas Campbell Rennie: douglas.c.rennie@usdoj.gov
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Gregory A. Robinson, Esq.: us@lawfrrl.com, laurie@larielaws.com

I certify that all parties required to be served have been served.

DATED: October 15, 2025.

WILENCHIK & BARTNESS, P.C.

/s/ Dennis I. Wilenchik

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