

**AFFIDAVIT OF SERVICE**

SUPREME COURT OF THE UNITED STATES

No. 25A

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STEPHANIE MURRIN,

*APPLICANT,*

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 Applicant.

That on the 31st day of December, 2025, I served the within *APPLICATION FOR AN EXTENSION OF TIME WITHIN WHICH TO FILE A PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT* in the above-captioned matter upon:

D. John Sauer  
Solicitor General of the United States  
U.S. Department of Justice  
950 Pennsylvania Ave., N.W.  
Washington, DC 20530-0001  
202-514-2203  
[SupremeCtBriefs@usdoj.gov](mailto:SupremeCtBriefs@usdoj.gov)

Brian J. Bilheimer  
Michael J. De Matos  
Michael S. Rapiejko  
Internal Revenue Service  
1085 Raymond Boulevard  
Suite 1500  
Newark, NJ 07102  
973-681-6614  
[brian.j.bilheimer@irs counsel.treas.gov](mailto:brian.j.bilheimer@irs counsel.treas.gov)  
[michael.s.rapiejko@irs counsel.treas.gov](mailto:michael.s.rapiejko@irs counsel.treas.gov)

by sending one copy 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 three copies of the within *APPLICATION FOR AN EXTENSION OF TIME WITHIN WHICH TO FILE A PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT* through the Overnight Next Day Federal Express, postage prepaid. In addition, the application 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.

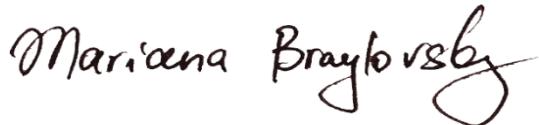
Executed on this 31st day of December, 2025.



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Melissa Pickett

Sworn to and subscribed before me this 31st day of December, 2025.



**MARIANA BRAYLOVSKIY**  
Notary Public State of New York  
No. 01BR6004935  
Qualified in Richmond County  
Commission Expires March 30, 2026  
#131855