
**In the
Supreme Court of the United States**

DAVID TANGIPA, *et al.*,

Applicants,

v.

GAVIN NEWSOM, *et al.*,

Respondents.

CERTIFICATE OF SERVICE

I, Michael A. Columbo, Counsel for Applicants and Member of the Bar of this Court, certify that on January 20, 2026, served copies of the attached Emergency Application for Writ of Injunction Pending Disposition of the Matter before the Three-Judge Panel and Disposition of the Petition for Writ to the Supreme Court of the United States via electronic mail and sent copies of the aforementioned response via overnight mail to the following counsel of record:

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