
In the
Supreme Court of the United States

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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 30, 2026, I served copies of the attached APPLICANTS’ REPLY IN SUPPORT OF EMERGENCY APPLICATION FOR WRIT OF INJUNCTION PENDING APPEAL to the Supreme Court of the United States via electronic mail and sent copies of the aforementioned documents via overnight mail to the following counsel of record:

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