No. 26-514

In the Supreme Court of the United States

ERIC S. SMITH,

Petitioner,

v.

SECURITIES AND EXCHANGE COMMISSION, ET AL.,

Respondents.

CERTIFICATE OF SERVICE

I hereby certify that I am a member in good standing of the bar of this Court and that on this 13th day of November, 2026, I caused three copies of the Brief of the Manhattan Institute as *Amicus Curiae* in Support of Petitioner to be served by third-party commercial carrier on the counsel below, and caused an electronic version to be transmitted to the counsel below, pursuant to this Court's Rule 29.5. All parties required to be served have been served.

/s/ Benjamin W. Snyder
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