



January 29, 2018

Mr. Scott S. Harris
Clerk
Supreme Court of the United States
1 First Street, N.E.
Washington, D.C. 20543

Re: Higgins v. Zion

Dear Mr. Harris

This is to notify you, pursuant to the Court's Rule 12.6, of Petitioner's belief that the following persons, who are parties below, have no interest in the outcome of the petition:

Defendant County of Orange

Please also be advised that the undersigned represents Defendant County of Orange in the underlying matter.

Thank you for your attention.

Sincerely,

WOODRUFF, SPRADLIN & SMART
A Professional Corporation

DANIEL K. SPRADLIN