

CERTIFICATE OF SERVICE

A copy of this application was served by email and U.S. mail to the counsel below in accordance with Supreme Court Rule 22.2 and 29.3:

Frederick A. Brodie, Esq.
Assistant Solicitor General
New York State Office of the Attorney General
The Capitol
Albany, New York 12224
Frederick.Brodie@ag.ny.gov



MARC A. SIMONETTI
Counsel of Record
STATE TAX LAW LLC
1177 Avenue of the Americas,
5th Floor
New York, New York 10036
(914) 452-0013
marc.simonetti@statetax.law