No. 24-416

IN THE SUPREME COURT OF THE UNITED STATES

COMMISSIONER OF INTERNAL REVENUE, PETITIONER v.

JENNIFER ZUCH

CERTIFICATE OF SERVICE

It is hereby certified that all parties required to be served have been served with copies of the **BRIEF FOR THE PETITIONER**, via e-mail and first-class mail, postage prepaid, this 14th day of February, 2025.

[See Attached Service List]

As required by Supreme Court Rule 33.1(h), I certify that the document contain <u>9730</u> words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct. Executed on <u>February</u> 14, 2025.

Sarah M. Harris

Acting Solicitor General

Counsel of Record

Department of Justice

Washington, D.C. 20530-0001

(202) 514-2217

February 14, 2025

Due to the continuing delay in receiving incoming mail at the Department of Justice, in addition to mailing your brief via first-class mail, we would appreciate a fax or email copy of your brief. If that is acceptable to you, please fax your brief to Charlene Goodwin, Supervisory Case Management Specialist, Office of the Solicitor General, at (202) 514-8844, or email at **SupremeCtBriefs@USDOJ.gov.** Ms. Goodwin's phone number is (202) 514-2217 or 2218.

24-0416 COMMISSIONER OF INTERNAL REVENUE JENNIFER ZUCH

> FRANK AGOSTINO AGOSTINO & ASSOCIATES, P.C. 14 WASHINGTON PLACE HACKENSACK, NJ 07601 201-488-5400 FAGOSTINO@AGOSTINOLAW.COM

JEFFREY M. DIRMANN 55 MADISON AVENUE 4TH FLOOR SUITE 17 MORRISTOWN, NJ 07960 862-812-2795 JDIRMANN@DIRMANNLAWPC.COM

SHAY DVORETZKY SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP 1440 NEW YORK AVENUE, N.W WASHINGTON, DC 20005-2111 202-371-7370 SHAY.DVORETZKY@SKADDEN.COM