

No. 26-

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In the  
Supreme Court of the United States

IN RE: EQUAL MEANS EQUAL, HEROICA FOUNDATION, AND  
JACQUELINE FENORE V. TRUMP

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PETITION FOR AN EXTRAORDINARY WRIT

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## **CORPORATE DISCLOSURE STATEMENT**

Pursuant to Supreme Court Rule 29.6, Petitioners Equal Means Equal, Heroica Foundation, and Jacqueline Fenore disclose the following. There is no parent or publicly held company owning 10% or more of Applicant's stock.

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| Defense Manpower Data Center, (2018) 2018 Demographics: <i>Profile of the Military Community</i> . United States Department of Defense, available at, <a href="https://download.militaryonesource.mil/12038/MOS/Reports/2018-demographics-report.df?utm">https://download.militaryonesource.mil/12038/MOS/Reports/2018-demographics-report.df?utm</a> ..... | 1 |
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## INTRODUCTION

This Petition is submitted pursuant to 28 U.S.C. § 1651(a) and presents the rare circumstance in which immediate intervention by this Court is necessary to preserve the integrity of its appellate jurisdiction and to prevent irreparable injury that cannot be remedied through ordinary judicial processes. Absent issuance of an extraordinary writ, Petitioners' rights cannot be protected, and meaningful appellate review will be rendered impossible.

Compounding these concerns, Petitioners were denied a meaningful opportunity to bring these issues to the Court's attention through the ordinary amicus process in a case now pending before the Court. *National Coalition for Men v. Selective Service System*, Docket No. 25-1157. (“*NCM*”). The filing deadline effectively foreclosed participation by non-parties. As a result, the Court has not been presented with critical information regarding the existence and significance of the *Equal Means Equal et al. v. Trump* litigation in the U.S. Court of Appeals for the First Circuit, CA No. 26-1596 (1st Cir.) (“*EME*”)

Petitioners represent tens of thousands of military and non-military women, including military women of color,<sup>1</sup> whose rights are at stake in two matters now pending before the Court. *NCM* and *Valame v. Trump*, 25-1259. (“*Valame*”). The issues in *NCM* and *Valame* center on the constitutionality of the Military Selective

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<sup>1</sup> Military women represented by Petitioners include thousands of women of color who are disproportionately represented in the United States military. Defense Manpower Data Center. (2018) *2018 Demographics: Profile of the Military Community*. United States Department of Defense, pg. 17 (“nearly 61% of the enlisted women in the DoD services are minority women ... African Americans account for a significantly higher percentage of military women compared to military men”), available at, <https://download.militaryonesource.mil/12038/MOS/Reports/2018-demographics-report.df?utm>

Service Act, 50 U.S.C., § 3801 et seq. (“MSSA”), a federal statute that requires men to register for the military draft but forbids women to do the same. Petitioners seek extraordinary relief because although *NCM* informed the court of several similar cases now pending in the lower courts, (*NCM* Pet. 15) neither *NCM* nor *Valame* informed the Court of the *EME* case, an important similar matter now pending in the First Circuit Court of Appeals.

Petitioners submit this request for issuance of an extraordinary writ not only to ensure that the Court is aware of the *EME* case, and to enable the Court to accept the *EME* case for substantive review if and when it grants review in *NCM*, *Valame*, or any similar case.<sup>2</sup>

The *EME* case should be included in this Court’s review of the constitutionality of the MSSA because it is the only case that adequately represents the interests of military and non-military women. Extraordinary relief is necessary and appropriate because this Court cannot responsibly decide the constitutional rights of female soldiers, much less the rights of women as a class, without at least affording women a meaningful right to be heard.

## **JURISDICTION**

This Court has jurisdiction under the All Writs Act, 28 U.S.C. § 1651(a), to issue writs necessary or appropriate in aid of its jurisdiction and agreeable to the usages and principles of law.

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<sup>2</sup> The Court has various options for coordinated consideration, including holding or consolidating the cases, or simply accepting the *EME* case in tandem with *NCM* and/or *Valame*, on its own initiative, or in response to this petition.

## STATEMENT OF THE CASE

In March 2026, *NCM* filed a petition for certiorari, asking this Court to review the constitutionality of the MSSA.<sup>3</sup> Petition for a Writ of Certiorari, *Nat'l Coalition for Men v. Selective Service System*, Docket No. 25-1157. *NCM's* petition was not publicly docketed until May 2026. *Valame's* certiorari petition was filed in March 2026 but, like *NCM's*, was not publicly docketed until May 2026. Petition for a Writ of Certiorari, *Valame v. Trump*, Docket No. 25-1259.

On May 29, after learning that *NCM* listed several “parallel litigation” cases in its certiorari petition, but failed to mention the *EME* case, Petitioners filed an amicus brief in the *NCM* case for the limited purpose of informing the court of the existence and significance of the *EME* case. Petitioners asked the Court to accept the *EME* case for substantive review if and when it granted review in either *NCM*, *Valame*, or any similar case. Petitioners’ amicus brief was filed within thirty days of *NCM's* public docketing, but the clerk declined to accept it on the grounds that it was untimely. *Amicus Brief of Nat'l Women's Veterans United, et al.*, *NCM*, Docket No. 25-1259, (May 29, 2026).

Petitioners and similarly situated others had no notice of *NCM's* pendency when it was filed. Once the case appeared on the public docket in early May 2026, the docket indicated a response deadline of May 11, 2026—only days later—leaving

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<sup>3</sup> Leading military and non-military women’s organizations were unaware of the *NCM* petition for certiorari when it was filed with this Court in March 2026, because it was not publicly docketed until May 2026. They are now actively organizing public events to raise awareness of the importance of the *NCM* case and the missing voices of military and non-military women in the Court’s consideration of the issues.

insufficient time for meaningful participation. Petitioners nevertheless filed an amicus brief within 23 days of public docketing for the limited purpose of informing the Court of the *EME* litigation and its relevance. The Clerk declined to accept even though Petitioners had no ability to comply with a deadline that effectively expired before the case was publicly accessible. As a result, the Court was deprived of information it needs to render a fair and just decision in the *NCM* case, information that would otherwise have been before the Court in the ordinary course.

*NCM* was scheduled for conference before the Court on June 4, 2026. The Court's order is expected June 8, 2026, making this Petition especially urgent because Petitioners seek by this action simply to make the Court aware of the pendency and relevancy of the *EME* case before it decides whether to grant *NCM*'s petition, and determines which other cases it will take for review that raise the same constitutional questions. Unless the Court is at least made aware of the *EME* case, it cannot include the *EME* litigation in its decision on June 8. This Petition is the only mechanism by which the Court can be made aware of the *EME* case because *NCM* inexplicably has taken no steps to correct the error in its petition. This is curious considering that the *EME* case was filed in the United States District Court for the District of Massachusetts more than a year ago, in April 2025. A year later, on April 21, 2026, the District Court ruled that the female Plaintiff in the *EME* case had standing, but that the case should be dismissed for failure to state a claim. Petitioner then filed a notice of appeal. Any reasonable litigant in *NCM*'s position would have known about the *EME* case and would have reported its existence to this Court.

This petition is solely designed to ensure that the Court is aware of the *EME* case before it issues a ruling in the *NCM* case, so that the rights and interests of military and non-military women can adequately be represented if and when the Court grants certiorari review in either *NCM*, *Valame*, or any similar case.

It would be unconscionable for this Court to decide a case that will determine the fundamental rights of military and non-military women without women at least having their voices heard – not in the weak style of an amicus brief, but as formal parties with the strongest possible advocacy for their fundamental rights.

### **REASONS FOR GRANTING THE WRIT**

#### **I. Adequate Relief Cannot Be Obtained in Any Other Form, Or from Any Other Court.**

Petitioners have no adequate alternative means of relief. The ordinary mechanism for informing the Court of the *EME* litigation—an amicus submission under Rule 37—was foreclosed by circumstances beyond Petitioners’ control. Because the petition was not publicly docketed until shortly before the Clerk’s deadline expired, Petitioners could not comply with the filing schedule. The Clerk’s subsequent rejection of Petitioners’ filing leaves this Petition as the only avenue for ensuring that the Court is aware of the *EME* case before acting on the *NCM* petition. If this Court grants review in *NCM* or *Valame*, Petitioner cannot obtain adequate relief elsewhere or in any other proceeding because the constitutional rights and interests of military and non-military women are at stake in both cases but are not adequately represented.

Only the *EME* case advances strong legal arguments on behalf of women and

makes the salient and compelling argument that if women must register for Selective Service and die on the front lines of battle alongside men, then they should die as fully equal citizens, whose claims of unequal treatment are subject to strict scrutiny review in the courts. *Equal Means Equal v. Trump*, No. 25-10806, 2026 U.S. Dist. LEXIS 87456 (D. Mass. 2026). NCM, a men's rights organization, makes no such argument. In fact, the *NCM* petition expressly asks for unequal treatment of women subject to only intermediate scrutiny review. *Nat'l Coal. for Men v. Selective Serv. Sys.*, No. 24-7746, 2025 U.S. App. LEXIS 31562 (9th Cir. 2025).

Only strict scrutiny effectively prevents discrimination because it requires the government to demonstrate a compelling reason to discriminate and requires further proof that the government narrowly tailored any such discrimination and used the least restrictive means to achieve its goal. *Ward v. Rock Against Racism*, 491 U.S. 781, 798-800 (1989). The much weaker standard of intermediate scrutiny requires the government to demonstrate only an important reason to discriminate, rather than a compelling one, and the means used to achieve the government's goal need not be narrowly tailored or use the least restrictive means. *Id.* In short, strict scrutiny forbids discrimination while intermediate scrutiny allows it. Only the *EME* case advocates for strict scrutiny.

Moreover, the *EME* case is more viable than the *NCM* case because *NCM* was denied standing by the Ninth Circuit, while standing was granted to the individual female plaintiff in the *EME* case. *NCM* at \*2. The *EME* case also asserts a claim under the Equal Rights Amendment, U.S. CONST. amend. XXVIII, ("ERA") while

*NCM* has no such claim, even though the American Bar Association, esteemed Harvard Law Professor Lawrence Tribe, and President Joseph Biden, among many others, agree that the ERA is currently valid and must be enforced.<sup>4</sup>

The parallel litigation cases cited by *NCM*, *Valame*,<sup>5</sup> *Kyle-Label*,<sup>6</sup> and *Doe*,<sup>7</sup> similarly fail adequately to represent the rights and interests of women. In *Valame*, the plaintiff is male, and he asks for only intermediate scrutiny under both the Equal Protection doctrine, *Valame v. Trump* at 1173, and the ERA, *id.*, despite the fact that the ERA requires strict scrutiny. *Frontiero v. Richardson*, 411 U.S. 677, 692 (1973) (Powell, J., concurring). Indeed, women have been fighting for the ERA for a long time precisely because it elevates sex discrimination claims to strict scrutiny review.

In the *Kyle-Label* case, the plaintiff is female, and like the plaintiff in the EME case she was granted standing after she was forbidden to register for Selective Service, but her claims were filed by a men's rights attorney, and they are moot because she long ago aged out of eligibility for Selective Service. *Kyle-Label* at 399. Moreover, *Kyle-Label* nowhere asks for strict scrutiny review. *Id.* The female Plaintiff in the EME case, by contrast, has standing, remains age-eligible for selective service, and asks for strict scrutiny review. *EME* at \*15.

*Kyle-Label* also has a class action claim that seeks to represent the interests

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<sup>4</sup> Joseph R. Biden, Jr., *Statement on the Equal Rights Amendment*, available at, <https://www.presidency.ucsb.edu/documents/statement-the-equal-rights-amendment-0>; Laurence H. Tribe, *Statement on the Current Status of the Equal Rights Amendment*, available at, <https://feminist.org/wp-content/uploads/2022/03/ERA-50th-Anniversary-Prof-Tribe-Letter.pdf>; American Bar Association, *Resolution on the Status of the Equal Rights Amendment*, available at, <https://www.americanbar.org/content/dam/aba/administrative/women/2024/res-601-adopted.pdf>.

<sup>5</sup> *Valame v. Trump*, S. Ct. No. 24-369 (9th Cir.).

<sup>6</sup> *Kyle-Label v. Selective Serv. Sys.*, No. 15-5193 (ES) (JAD).

<sup>7</sup> *Doe v. Selective Serv. Sys.*, No. 23-cv-02403-JST (N.D. Cal. 2024).

of all women, but the court has not granted class status. *Kyle-Labelle* at 400. Nor could *Kyle-Labelle* case ever deign to speak for women as a class because, as noted above, her case was filed by a men's rights attorney, asserts no claim under the ERA, and nowhere asks for strict scrutiny review. *Id.*

The *Doe* case is similarly inadequate to represent the rights and interests of women because it has a male plaintiff who asserts an Equal Protection claim, but fails to ask for strict scrutiny, and has no ERA claim. *Doe* at \*1.

If Petitioners are not included as formal parties to this Court's decision-making process, the Court will determine profoundly important rights for women, without even considering the strongest possible arguments on their behalf. In turn, the Court will rule against women's legal equality, not because women failed to persuade the Court that it was the right thing to do, but because nobody asked. The Court should grant this extraordinary writ because once such a ruling is issued, the opportunity for women to at least *ask* for full legal equality will be over.

## **II. Issuance Of the Writ Is Necessary in Aid of This Court's Appellate Jurisdiction.**

An extraordinary writ should be granted because it can hardly be denied that this Court will benefit from hearing the voices of women, asserting the strongest possible arguments in defense of their rights under the Constitution. Win or lose, the Court should be eager to hear all possible arguments on women's behalf because it is women who will be most affected by the Court's decision. No court should want to decide the fundamental rights of women without women having not just a voice but the leading voice.

On the eve of the 250<sup>th</sup> anniversary of the Declaration of Independence, it bears emphasizing that women, like men, have been sacrificing their lives in service to this country since the dawn of our nation.<sup>8</sup> And while there was a time when women did not serve equally because they were not always eligible to fight in combat, which served as justification for this Court's decision in *Rostker v. Goldberg*, 453 U.S. 57 (1981), to uphold the constitutionality of the exclusion of women from the MSSA precisely because women were not combat eligible, women have even been fighting on the front lines of battle in all military branches since 2015. National Public Radio, *Pentagon Says Women Can Now Serve in Front-Line Ground Combat Positions*, NPR.org, (Dec. 3, 2015). With women now combat eligible, many agree that *Rostker* must be overturned. Indeed, in 2021, three justices from this Court expressed their willingness to overturn *Rostker* for precisely this reason. Petition for Certiorari, *Nat'l Coalition for Men v. Selective Service System*, 141 U.S. 1816 (2021), (Sotomayor, Breyer and Kavanaugh, JJ., concurring in the denial of certiorari).

Where this Court has made clear its desire to force women to register for Selective Service, it is beyond cavil that women deserve to be heard before such an important decision is rendered. This could be the first time in history that women are forced by the government to join the military draft and sacrifice their lives for their country on par with the sacrifices expected of men. Women must be afforded an opportunity to make the powerful point that no female soldier should bleed to death

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<sup>8</sup> Kennedy, L., *Women in the U.S. Military, Timeline: From the Revolutionary War to the Wars in Iraq, U.S. Women Have Served Critical Roles in Military Forces*, October 9, 2025, History.com, available at, <https://www.history.com/articles/women-us-military-timeline>.

in combat defending a constitution that subjects her to unequal treatment under the law. Indeed, women can and should have the chance to remind this Court of what it said many years ago about the Equal Protection doctrine: “The guarantee of equal protection cannot mean one thing when applied to one individual and something else when applied to [another]...” *Regents of the University of California v. Bakke*, 438 U.S. 265, 289-90 (1978). Only the *EME* case affords women this opportunity.

### **III. The Circumstances Are Exceptional.**

If this Court undertakes to decide whether women should register for Selective Service, it will be deciding the most consequential case for women since *Craig v. Boren*, when it held that women’s Equal Protection rights would be subject to unequal enforcement under intermediate scrutiny rather than strict scrutiny, 429 U.S. 190, 220-21 (1976).

Deciding whether women should register for Selective Service requires the Court to also determine whether forcing women into combat entitles women to improved status under the Equal Protection doctrine such that they move from unequal protection (intermediate scrutiny) to fully equal protection (strict scrutiny). To do this, the Court must focus on the plain text of the Constitution, as it did in *Dobbs v. Jackson Women’s Health Org.*, when it ruled that the Constitution’s language does not expressly protect abortion rights, 597 U.S. 215 (2022). Under the Court’s textualist approach to constitutional analysis, women can no longer be subjected to intermediate scrutiny because the Constitution’s plain language states that “persons” shall have Equal Protection of the laws. U.S. CONST. amend. XIV.

Nothing in the Constitution permits unequal protection of female persons. Or as Justice Rehnquist pointed out many years ago, the Court invented intermediate scrutiny “out of thin air” because “[t]he Equal Protection clause contains no such language and none of [the Court’s] previous cases adopt that standard.” *Craig v. Boren*, 429 U.S. at 220-21, (Rehnquist, J., dissenting).

This Court should not undertake to decide such an important case without at least one lawyer formally at the table (not as a mere amicus) advancing the strongest possible arguments on behalf of women.

Women have no hope of achieving equality if lawyers do not at least ask for strict scrutiny, and object to intermediate scrutiny. When *Plessy v. Ferguson*, 163 U.S. 537 (1896), established the concept of separate but equal rights for Black people, lawyers applied it, but also criticized it. And when it became clear that such a racist doctrine was constitutionally indefensible, this Court rightly overturned *Plessy* in *Brown v. Board of Education*, 347 U.S. 483 (1954). *Craig* is women’s *Plessy* because it permits the separate and unequal treatment of women. Whether women prevail or not, this Court must at least *listen* to women argue in favor of overturning *Craig* and establishing women’s full equality once and for all.

This case presents a rare convergence of procedural and substantive defects. Petitioners were effectively prevented from participating through the ordinary amicus process in the *NCM* certiorari petition matter due to a docketing and scheduling anomaly, while the petition itself omits the *EME* litigation, a materially relevant case. Standing alone, each issue is serious. Together, they create a

circumstance in which the Court risks deciding *NCM* petition on an incomplete and procedurally distorted record. Extraordinary relief is therefore necessary to protect the integrity of the Court's jurisdiction and prevent irreparable harm to all women.

**PRAYER FOR RELIEF**

For the foregoing reasons, Petitioners respectfully request that this Court:

1. Issue an extraordinary writ recognizing the *EME* case as a parallel proceeding in the lower courts and accept it for review if and when the Court grants review in *NCM*, *Valame*, or any similar case.
2. Grant such additional relief as may be necessary to preserve this Court's jurisdiction and protect Petitioners' rights; and
3. Award any other relief the Court deems just and proper.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was served on all parties of record through the ECF filing system.

/s/ Wendy J. Murphy

Date: June 5, 2026

**CERTIFICATE OF COMPLIANCE**

I hereby certify that this document complies with Supreme Court Rules 29, 33.1, 34 and 37.

/s/ Wendy J. Murphy

Date: June 5, 2026