## IN THE SUPREME COURT OF THE UNITED STATES

No. 17-1687

THEODORE E. SUHL, PETITIONER

v.

## UNITED STATES OF AMERICA

## CERTIFICATE OF SERVICE

I, Kannon K. Shanmugam, counsel for petitioner and a member of the Bar of this Court, certify that, on September 5, 2018, three copies of the Reply Brief for the Petitioner in the above-captioned case were sent, by third-party commercial carrier for delivery overnight and by electronic mail, to the following counsel:

Noel J. Francisco, Esq. Solicitor General United States Department of Justice 950 Pennsylvania Avenue, N.W., Room 5616 Washington, DC 20530 SupremeCtBriefs@usdoj.gov

I further certify that all parties required to be served have been served.

Kannon K. Shanmugam