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September 19, 2018

Honorable Scott S. Harris  
Office of the Clerk  
Supreme Court of the United States  
Washington, D.C. 20543

Re: Thilo Brown v. United States, No. 17-9276

Dear Mr. Harris:

This case has been distributed for the Court's consideration at its conference on September 24, 2018. Petitioner files this supplemental brief in response to the letter from the Solicitor General dated September 12, 2018. We ask that you distribute this supplemental brief to the Justices in advance of the conference. Thank you for your assistance.

Sincerely,



Alicia Vachira Penn  
Assistant Federal Public Defender