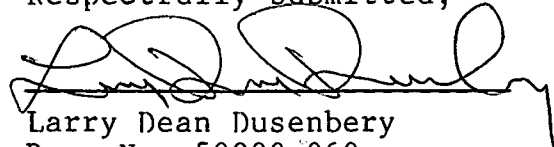


Descamps. Petitioner's situation is the same as Hill's. He is relying on the same Supreme Court cases as Hill did. Petitioner was also sentenced in the same circuit as Hill's 2241 petition. Moreover, at the time of Petitioner's first 2255 motion, this Court had not issued its rulings in Descamps and Mathis. And the government has also conceded in numerous cases that Descamps and Mathis are retroactive. See, e.g., Hill at 595. There is no difference between Hill's case and Petitioner's case. Therefore, the government's argument is without merit.

CONCLUSION

The petition for a writ of certiorari should be granted. Alternatively, this Court should grant certiorari in this case and Wheeler and consolidate both cases for argument.

Respectfully submitted,

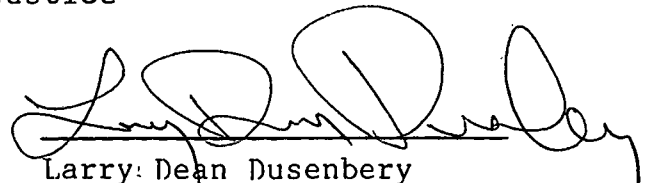


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CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing this 13th day of December, 2018, was served upon the following:

Office of the Solicitor General
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20540



Larry Dean Dusenbery