In the Supreme Court of the United States

MANUEL ENRIQUE SANTANA,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF SERVICE

I, Andrew J. Pincus, counsel for petitioner and a member of the Bar of this Court, certify that on this 21st day of November, 2018, I caused three copies of this petition for a writ of certiorari to be served by overnight mail and electronic means on the following:

Noel J. Francisco Solicitor General United States Department of Justice 950 Pennsylvania Avenue, NW Washington, DC 20530-0001 SupremeCtBriefs@USDOJ.gov

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

Sincerely,

Andrew J. Pincus