## In the Supreme Court of the United States

JEFFREY ALAN OLSON,
Petitioner
v.

PENNSYLVANIA,
Respondent

On Petition for Writ of Certiorari to the Supreme Court of Pennsylvania

## CERTIFICATE OF SERVICE

I certify that I served the Respondent's Brief in Opposition on counsel for the petitioner on May 1, 2020 by electronic mail service, such form of service having been authorized by mutual agreement of counsel. I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

/s/

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