

No. 19-108

IN THE SUPREME COURT OF THE UNITED STATES

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UNITED STATES OF AMERICA, PETITIONER

v.

MICHAEL J.D. BRIGGS

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**CERTIFICATE OF SERVICE**

It is hereby certified that all parties required to be served have been served with copies of the **REPLY BRIEF FOR THE PETITIONER**, via email and first-class mail, postage prepaid, this 28<sup>th</sup> day of August, 2019.

**[See Attached Service List]**

As required by Supreme Court Rule 33.1(h), I certify that the document contains **2,996** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct. Executed on **August 28, 2019.**

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Noel J. Francisco  
Solicitor General  
Counsel of Record  
Department of Justice  
Washington, D.C. 20530-0001  
(202) 514-2217

**August 28, 2019**

Due to the continuing delay in receiving incoming mail at the Department of Justice, in addition to mailing your brief via first-class mail, we would appreciate a fax or email copy of your brief. If that is acceptable to you, please fax your brief to Charlene Goodwin, Supervisory Case Management Specialist, Office of the Solicitor General, at (202) 514-8844, or email at **SupremeCtBriefs@USDOJ.gov**. Ms. Goodwin's phone number is (202) 514-2217 or 2218.

19-0108  
USA  
MICHAEL J.D. BRIGGS

MAJ. JOHNATHAN LEGG  
FAIRCHILD HALL  
ROOM 6H-194  
US AIR FORCE ACADEMY, CO 80840  
[JOHNATHAN.LEGG@USAFA.EDU](mailto:JOHNATHAN.LEGG@USAFA.EDU)

STEVEN I. VLADECK  
727 EAST DEAN KEETON STREET  
AUSTIN, TX 78705  
[SVLADECK@LAW.UTEXAS.EDU](mailto:SVLADECK@LAW.UTEXAS.EDU)

**VIA EMAIL**

TERRI ZIMMERMAN  
770 S. POST OAK LANE  
SUITE 620  
HOUSTON, TX 77056  
[TERRI.ZIMMERMAN@ZLZSLAW.COM](mailto:TERRI.ZIMMERMAN@ZLZSLAW.COM)