

IN THE  
**Supreme Court of the United States**

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THOMAS FRANKLIN BOWLING,  
*Petitioner,*

v.

DIRECTOR, VIRGINIA DEP'T OF CORRECTIONS,  
*Respondent.*

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**On Petition for Writ of Certiorari to the  
United States Court of Appeals for the Fourth Circuit**

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY**, pursuant to Supreme Court Rule 29, that on this date, March 4, 2020, true copies of the Petition's Reply were hand-delivered to the Clerk, United States Supreme Court, One First Street, N.E., Washington, DC, 20543, and mailed by first class mail to the Solicitor General of Virginia, Office of the Attorney General, 202 North Ninth Street, Richmond, Virginia, 23219.

All parties required to be served have been served.

EXECUTED this 4<sup>th</sup> day of March 2020.

/s/ Erica Hashimoto

ERICA HASHIMOTO

*Counsel of Record*

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