



## CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 unbound and 40 copies of the foregoing Supplemental Brief for Petitioner in 19-737, *James Nathaniel Douse v. United States of America, et al.*, were sent via Next Day Service to the U.S. Supreme Court, and 3 copies were sent via Next Day Service to the following parties listed below, this 13th day of February, 2020:

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All parties required to be served have been served.

I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on February 13, 2020.

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Subscribed and sworn to before me by the said Affiant on the date below designated.

Date: Feb 13, 2020  
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Notary Public

[seal]



JULIE ANNE KERSHNER  
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