

PROOF OF SERVICE

I certify under penalty of perjury that the following is true and correct:

I am an attorney for Joseph Njunguna Njonge, appointed under the Criminal Justice Act, 18 U.S.C. § 3006A. Pursuant to Supreme Court Rule 29.3, I served copies of Petitioner's Reply Brief and Certificate of Word Count on counsel for Respondent, Washington State Deputy Solicitor General Peter B. Gonick.

Furthermore, pursuant to this Court's Order dated April 15, 2020, I reached an agreement with counsel for Respondent to serve this filing through electronic means only, at peter.gonick@atg.wa.gov, eliminating the need for paper service.

DATED this 22nd day of June 2020.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Filipovic", written over a horizontal line.

Michael Filipovic
Federal Public Defender
Counsel for Petitioner