

IN THE
Supreme Court of the United States

MICHAEL TYRONE SIMPSON,
Petitioner,
v.

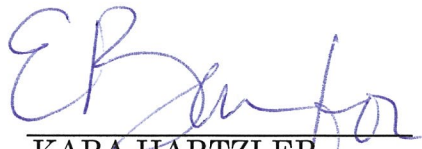
UNITED STATES OF AMERICA,
Respondent.

On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Ninth Circuit

Certificate of Service

I, Kara Hartzler, appointed to represent the petitioner under the Criminal Justice Act, certify that on August 11, 2020, one copy of the Petitioner's Reply to the United States' Brief in Opposition to Petition for a Writ of Certiorari, in the above-captioned case were served by first-class mail, postage prepaid, to respondent's counsel. I further certify that all parties required to be served have been served. Service was addressed as follows:

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