



CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 40 bound copies and 1 unbound copy of the foregoing Reply Brief for Petitioner in 20-1240, *Francisco Javier Palillero v. United States of America*, were sent via Next Day Service to the U.S. Supreme Court, and 3 copies via Next Day and e-mail service to the following parties listed below, this 10th day of September, 2021:

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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 September 10, 2021.

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

Date: September 10, 2021

John D. Gallagher
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[seal]



JOHN D. GALLAGHER
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My Commission Expires
February 14, 2023