## In The Supreme Court of the United States

ANNA VALENTINE, Warden

Petitioner

v.

JOHNNY PHILLIPS

Respondent

On Petition for Writ of Certiorari to the United States Court Of Appeals for the Sixth Circuit Case No. 18-6184

## **PROOF OF SERVICE**

The foregoing Supplemental Brief was filed electronically this 26<sup>th</sup> day of April, 2021, and was also mailed via United States Postal Service to the Clerk of this Court.

Further, I, Courtney J. Hightower, a member of the Bar of this Court, hereby certify that on the 26<sup>th</sup> day of April, 2021, a copy of this Supplemental Brief was mailed via United States Postal Service, postage prepaid, to Hon. Ryan M. Chabot, Counsel for Respondent, Wilmer Cutler Pickering Hale and Dorr LLP, 250 Greenwich Street, 7 World Trade Center, New York, NY 10007; Hon. Daniel Crump, Wilmer

Cutler Pickering Hale and Dorr LLP, 350 South Grand Avenue, Suite 2100, Los Angeles, CA 90071.

/s/Courtney J. Hightower Courtney J. Hightower Assistant Attorney General Office of the Solicitor General

Criminal Appeals Unit 1024 Capital Center Drive Frankfort, Kentucky 40601

(502) 696-5342

Counsel for Petitioner