

No. 20-  
IN THE  
**Supreme Court of the United States**

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MICHAEL P. O'DONNELL,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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**PROOF OF SERVICE**

I, Rita L. Hemenway of Bateman & Slade, Inc., hereby declare that on this twentieth day of August 2020, I have served one (1) true copy of the Petition for Writ of Certiorari by express mail, postage prepaid, addressed as follows:

Noel J. Francisco  
Solicitor General  
United States Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001  
SupremeCtBriefs@USDOJ.gov  
202-514-2217  
Counsel for United States

Signed under the pains and penalties of perjury,

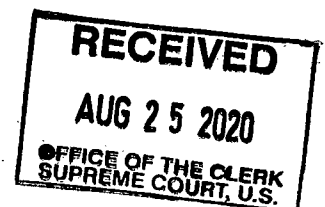
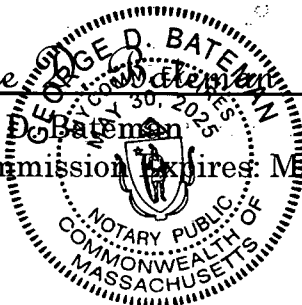
*Rita L. Hemenway*

Rita L. Hemenway

NOTARIZED BY:

*George D. Bateman*

George D. Bateman  
My Commission Expires: May 30, 2025



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**CERTIFICATE OF WORD COUNT**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 8,137 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 20, 2020.

*Rita L. Hemenway*

Rita L. Hemenway

NOTARIZED BY

*George D. Bateman*

George D. Bateman

My Commission Expires May 30, 2025

