

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

MICHAEL P. O'DONNELL,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

**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

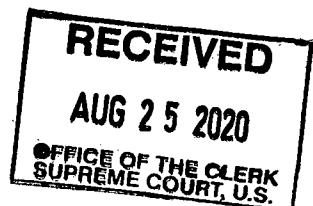
Signed under the pains and penalties of perjury,

Rita L. Hemenway

Rita L. Hemenway

NOTARIZED BY:

George D. Bateman  
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).

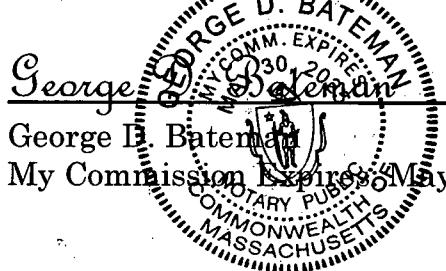
I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 20, 2020.

Rita L. Hemenway

Rita L. Hemenway

NOTARIZED BY



George D. Bateman  
My Commission Expires May 30, 2025