No. 20-291 In the Supreme Court of the United States

JAMELL BIRT,

Petitioner,

v.

UNITED STATES,

Respondent.

CERTIFICATE OF SERVICE

I, Zachary C. Schauf, hereby certify that I am a member of the Bar of this Court, and that I have this 24th day of November 2020, caused a paper copy of the Reply Brief In Support of Petition for a Writ of Certiorari to be delivered to the Court and an electronic version of the document to be delivered to:

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/s/ Zachary C. Schauf

Zachary C. Schauf