

CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 copy of the foregoing Reply Brief for the Petitioner in 20-401 *Devan Pierson v. United States of America*, was sent via Next Day Service to the U.S. Supreme Court, and via e-mail service to the following parties listed below, this 26th day of January, 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 January 26, 2001.

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

Date: January 26, 2001
John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023