No. 20-437

IN THE

Supreme Court of the United States

UNITED STATES,

Petitioner,

v.

REFUGIO PALOMAR-SANTIAGO,

Respondent.

PROOF OF SERVICE

The undersigned certifies that he has this 26th day of January 2021, caused one copy of the foregoing Motion for Appointment of Counsel to be served on the below-named counsel by first-class mail, postage prepaid, and further certifies that all persons required to be served have been served:

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