IN THE

Supreme Court of the United States

UNITED STATES OF AMERICA,

Petitioner,

v. Dzhokhar A. Tsarnaev,

Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the First Circuit

CERTIFICATE OF SERVICE

I am a member of the Bar of this Court, and I hereby certify pursuant to Supreme Court Rules 29.3 and 29.5 (as modified by the Court's Order of April 15, 2020) that I have, this 5th day of November, 2020, served the Brief for the National Fraternal Order of Police as Amicus Curiae Supporting Petitioner upon each party separately represented in this proceeding by causing an electronic copy of the same to be delivered to counsel of record at the e-mail addresses listed below:

Jeffrey B. Wall SupremeCtBriefs@USDOJ.gov Counsel for Petitioner

Ginger D. Anders ginger.anders@mto.com Counsel for Respondent Pursuant to the Court's April 15 Order, I certify that all parties have agreed to accept such electronic service in lieu of service of paper copies. I further certify that all persons required to be served have been served.

In addition, pursuant to Supreme Court Rule 29.7, I certify that I have caused electronic copies of all documents to be filed with the Clerk.

/s/ William M. Jay

William M. Jay GOODWIN PROCTER LLP 1900 N Street, N.W. Washington, DC 20036 wjay@goodwinlaw.com (202) 346-4000

Counsel for Amicus Curiae

November 5, 2020