## IN THE

## Supreme Court of the United States

UNITED STATES OF AMERICA,

Petitioner,

v.

MICHAEL ANDREW GARY,

Respondent.

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

## CERTIFICATE OF SERVICE

The undersigned certifies that he has this 8th day of December 2020, caused one copy of the foregoing **Motion to Proceed** *in Forma Pauperis* 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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