## IN THE Supreme Court of the United States

UNITED STATES OF AMERICA,

Petitioner,

v.

MICHAEL ANDREW GARY,

Respondent.

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

## CERTIFICATE OF SERVICE

The undersigned certifies that he has this 12th 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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