

IN THE SUPREME COURT OF THE UNITED STATES

TONY BROWN,

PETITIONER,

- vs -

UNITED STATES OF AMERICA,

RESPONDENT

**Certificate of Service**

I certify that I was appointed to represent Petitioner, Tony Brown, pursuant to 18 U.S.C. § 3006(A). Consistent with this Court's April 15, 2020 order regarding public health concerns relating to Covid 19, I further certify that I served the enclosed Reply Brief for Petitioner to the United States Court of Appeals for the Ninth Circuit through the Supreme Court's electronic-filing program on December 21, 2020. I further certify that all parties are registered with that electronic-filing program.

Also, consistent with this Court's April 15, 2020 order, I deposited one copy of the Reply Brief in via Federal Express for overnight delivery to the Court. I did not serve the government with a paper copy since it has agreed to electronic service.

Dated: December 21, 2020

/s John C. Lemon  
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