

No. 20-5216

IN THE SUPREME COURT OF THE UNITED STATES

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BRENT ANDERSON, PETITIONER

v.

UNITED STATES OF AMERICA

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**CERTIFICATE OF SERVICE**

It is hereby certified that all parties required to be served have been served with copies of the **MEMORANDUM FOR THE UNITED STATES**, via email and first-class mail, postage prepaid, this 9th day of October 2020.

**[See Attached Service List]**

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October 9, 2020

Due to the continuing delay in receiving incoming mail at the Department of Justice, in addition to mailing your brief via first-class mail, we would appreciate a fax or email copy of your brief. If that is acceptable to you, please fax your brief to Charlene Goodwin, Case Management Supervisor, Office of the Solicitor General, at (202) 514-8844, or email at **SupremeCtBriefs@USDOJ.gov**. Ms. Goodwin's phone number is (202) 514-2217 or 2218. Thank you for your consideration of this request.

20-5216  
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