

**CERTIFICATE OF SERVICE**

JAMES M. BRANDEN, ESQ., pursuant to Title 28, United States Code, section 1746, hereby declares under penalty of perjury:

That I am the attorney of record for Petitioner Wilbert Hayes.

That on July 25, 2020, in accordance with Rule 29.4(a) of the Rules of the Supreme Court of the United States, I caused one copy of the within Petition for a Writ of Certiorari with Appendices and Motion to Proceed in Forma Pauperis by first-class mail to:

Solicitor General of the United States  
Room 5614, Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, DC 20530-0001

and to:

Monica J. Richards, Esq.  
Assistant United States Attorney  
Western District of New York  
138 Delaware Avenue  
Buffalo, NY 14202

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York  
July 25, 2020

  
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JAMES M. BRANDEN