In the Supreme Court of the United States

RODNEY CARLISLE, JR.,

Petitioner,

v.

COMMONWEALTH OF KENTUCKY,

Respondent.

CERTIFICATE OF SERVICE

I, Michael A. Vatis, counsel for *Amici*, hereby certify that on this 21st day of December, 2020, I caused copies of the Brief of *Amici Curiae* Professors of Criminal Law and Criminal Procedure in Support of Petitioner to be served by electronic mail on the following counsel:

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I further certify that all parties required to be served have been served.

/s/ Michael A. Vatis

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