

No. \_\_\_\_\_

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**In The**  
**Supreme Court of the United States**

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VIRGIL NICKENS,  
*Petitioner,*  
v.

UNITED STATES OF AMERICA,  
*Respondent.*

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*On Petition for a Writ of Certiorari to the United  
States Court of Appeals for the Eleventh Circuit*

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**CERTIFICATE OF SERVICE**

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CHRISTINE A. FREEMAN  
EXECUTIVE DIRECTOR  
MACKENZIE S. LUND  
*Counsel of Record*  
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September 4, 2020

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I, Mackenzie S. Lund, counsel of record for petitioner, do hereby certify that on September 4, 2020, as required by Rule 29.4(a) of the Rules of the Supreme Court of the United States, I served the enclosed Petition for Writ of Certiorari on the Solicitor General of the United States, Room 5616, Department of Justice, 950 Pennsylvania Ave., N. W., Washington, DC 20530-0001, by first class mail, postage prepaid.

Respectfully Submitted,

/s/ Mackenzie S. Lund  
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Executed on September 4, 2020