

No. 20-5645

IN THE SUPREME COURT OF THE UNITED STATES

VIRGIL NICKENS, PETITIONER

v.

UNITED STATES OF AMERICA

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 13th day of November, 2020.

[See Attached Service List]

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November 13, 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, Supervisory Case Management Specialist, 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.

20-5645
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