

No. 20-579

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

ZIMMIAN TABB, PETITIONER,

*v.*

UNITED STATES OF AMERICA

**CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with Supreme Court Rule 29 and this Court's Order of April 15, 2020, all parties required to be served have been served with copies of the foregoing **SUPPLEMENTAL BRIEF FOR THE PETITIONER**, via e-mail, this 3rd day of March 2021. All parties had previously consented to electronic service consistent with this Court's order of April 15, 2020

Elizabeth B. Prelogar  
*Acting Solicitor General*  
United States Department of Justice  
950 Pennsylvania Ave., NW,  
Washington, D.C. 20530-0001  
SupremeCtBriefs@usdoj.gov  
(202) 514-2217

I declare under penalty of perjury the foregoing is true and correct. Executed on March 3, 2021.

/s John P. Elwood  
John P. Elwood  
*Counsel of Record*  
ARNOLD & PORTER KAYE SCHOLER LLP  
601 Massachusetts Ave., NW  
Washington, DC 20001  
(202) 942-5000  
john.elwood@arnoldporter.com

March 3, 2021