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NO. \_\_\_\_\_

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**IN THE UNITED STATES SUPREME COURT**

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**DAVID EARL BROWN,**

**Petitioner,**

**v.**

**UNITED STATES OF AMERICA,**

**Respondent.**

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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that a true and exact copy of the enclosed Motion for Leave to Proceed in Forma Pauperis, Petition for a Writ of Certiorari and Appendix have been served upon the Solicitor General of the United States, Room 5616, Department of Justice, 950 Pennsylvania Ave, N.W., Washington, D.C., 20530-0001, and to Debra A. Breneman, Assistant United States Attorney, 800 Market Street, Knoxville, Tennessee, 37902, by placing a true and exact copy of the foregoing with the third-party carrier (Federal Express) on December 11, 2020 with sufficient postage to carry the same to its destination. Ms. Breneman was also served via e-mail.

This the 11th day of December, 2020.

*/s/ Erin Rust*

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