

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

---

IN THE  
**Supreme Court of the United States**

BRIAN KEITH FIGGE,

*Petitioner,*

v.

SCOTT FRAUENHEIM, WARDEN,

*Respondent.*

---

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

---

**CERTIFICATE OF SERVICE**

---

I, Mark R. Drozdowski, a Deputy Federal Public Defender in the Office of the Federal Public Defender, which was appointed as counsel for Petitioner under the Criminal Justice Act, 18 U.S.C. § 3006(A)(b), and who is a member of the Bar of this Court, hereby certifies that, pursuant to Supreme Court Rule 29.3, on December 14, 2020, a copy of the enclosed Motion for Leave to Proceed *in Forma Pauperis*, Petition for a Writ of Certiorari, Appendix to

Petition for Writ of Certiorari, and Certificate Pursuant to Rule 33 was  
mailed postage prepaid and electronically mailed to:

Vincent P. LaPietra Counsel for Respondent  
Deputy Attorney General  
Office of the California Attorney General  
600 West Broadway, Suite 1800  
San Diego, CA 92101  
DocketingLAAWT@doj.ca.gov  
vincent.lapietra@doj.ca.gov

All parties required to be served have been served. I declare under  
penalty of perjury under the laws of the United States of America that the  
foregoing is true and correct.

Executed on December 14, 2020 at Los Angeles, California.



---

MARK R. DROZDOWSKI\*  
Deputy Federal Public Defender  
Attorneys for Petitioner  
*\*Counsel of Record*