

No. 20-7622  
IN THE  
*Supreme Court of the United States*

MERLE DENEZPI,  
*Petitioner,*

v.

UNITED STATES,  
*Respondent.*

CERTIFICATE OF SERVICE

I, Ian Heath Gershengorn, hereby certify that I am a member of the Bar of this Court, and that I have this 18th day of January 2022, caused three copies of the Brief of *Amici Curiae* Federal Indian Law Scholars and Historians in Support of Respondent to be served via overnight mail and an electronic version of the document to be transmitted via the Court's electronic filing system to:

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