

NO. 20-8053

---

IN THE SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 2020

---

William Leroy Sanders - Petitioner,

vs.

United States of America - Respondent.

---

**PROOF OF SERVICE**

---

I, Nova D. Janssen, a member of the Bar of this Court, hereby certify that on October 21, 2021, one copy of the Petitioner's Reply Brief in the above-entitled case was mailed by depositing them in a U.S. Postal Service Depository located at Des Moines, Iowa, first class postage prepaid addressed to counsel for the respondent:

Solicitor General of the United States  
Room 5614, Department of Justice  
10th Street and Constitution Avenue, NW  
Washington, D.C. 20530

I further certify that all parties required to be served have been served.

RESPECTFULLY SUBMITTED,

/s/ Nova D. Janssen

Nova D. Janssen  
Federal Public Defender's Office  
Capital Square, 400 Locust St., Suite 340  
Des Moines, Iowa 50309  
Phone: (515) 309-9610 Fax: (515) 309-9625  
ATTORNEY FOR PETITIONER