IN THE SUPREME COURT OF THE UNITED STATES

No. 20-860

RYAN RANDALL GILBERTSON, PETITIONER

v.

UNITED STATES OF AMERICA

CERTIFICATE OF SERVICE

I, Kannon K. Shanmugam, counsel for petitioner and a member of the Bar of this Court, certify that, on June 1, 2021, three copies of the Reply Brief for the Petitioner in the above-captioned case were sent, by third-party commercial carrier for delivery overnight and by electronic mail, to the following counsel:

> Elizabeth B. Prelogar, Esq. Acting Solicitor General United States Department of Justice 950 Pennsylvania Avenue, N.W., Room 5616 Washington, DC 20530 SupremeCtBriefs@usdoj.gov

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

Kannon K. Shanmugam