

No. 21-1157
IN THE
Supreme Court of the United States

DENNIS SPENCER,
Petitioner,
v.
COLORADO,
Respondent.

CERTIFICATE OF SERVICE

I, Douglas E. Litvack, hereby certify that I am a member of the Bar of this Court, and that I have this 24th day of March 2022, caused three copies of the Brief for Amici Curiae Due Process Institute, Human Rights Defense Center, Idaho Association of Criminal Defense Lawyers, and National Association for Public Defense in Support of Petitioner 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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