No. 21-1436

In the Supreme Court of the United States

LEON SANTOS-ZACARIA,

Petitioner,

v.

MERRICK GARLAND, U.S. ATTORNEY GENERAL,

Respondent.

CERTIFICATE OF SERVICE

I, Paul W. Hughes, a member of the Bar of this Court, certify that on this seventeenth day of November, 2022, I caused three copies of this brief for petitioner to be served by overnight mail and one copy to be served by electronic means on the following:

Elizabeth B. Prelogar Solicitor General United States Department of Justice 950 Pennsylvania Avenue, NW Washington, DC 20530-0001 SupremeCtBriefs@USDOJ.gov

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

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Paul W. Hughes