

IN THE  
**Supreme Court of the United States**

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ASHLEY MERE HOWARD,  
*Petitioner,*  
v.

THE STATE OF TEXAS,  
*Respondent.*

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On Petition for a Writ of Certiorari  
To the Texas Court of Criminal Appeals

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**RESPONDENT'S PROOF OF SERVICE**

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As required by Supreme Court Rule 29.3, I certify that on January 3, 2022, three copies of Respondent's Brief in Opposition were sent via both third-party commercial carrier and electronic mail to Petitioner's counsel of record, Randolph L. Schaffer Jr., 1021 Main, Suite 1440, Houston, TX 77002; and email: noguilt@swbell.net. All parties required to be served have been served. I am a member of the Bar of this Court.

s/ Craig W. Cosper  
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