

No. 21-340  
IN THE  
**Supreme Court of the United States**

ORLANDO CARTER,  
*Petitioner,*

*v.*

DISTRICT OF COLUMBIA,  
*Respondent.*

CERTIFICATE OF SERVICE

I, Jessica Ring Amunson, hereby certify that I am a member of the Bar of this Court, and that I have this 17th day of December 2021, caused three copies of the Reply Brief for the 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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