

IN THE
SUPREME COURT OF THE UNITED STATES

JAMES. H. BATES,
Petitioner,
v.

UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF SERVICE

I, Samantha J. Kuhn, court-appointed counsel for Petitioner James H. Bates, do hereby certify that on this date, November 17, 2021, I transmitted an electronic version of the enclosed Reply Brief of Petitioner to the following:

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I further certify that, on the same date, paper copies of the forgoing Reply Brief were mailed to the Office of the Solicitor General by depositing them with the United States Postal Service, first-class postage prepaid, for delivery to the following:

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All parties required to be served have been served.

Respectfully submitted this 17th day of November, 2021

/s/ Samantha Kuhn
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