

No. 21-5634

IN THE SUPREME COURT OF THE UNITED STATES

---

MICHAEL D. FORBES, PETITIONER

v.

UNITED STATES OF AMERICA

---

**CERTIFICATE OF SERVICE**

It is hereby certified that all parties required to be served have been served with copies of the **MEMORANDUM FOR THE UNITED STATES IN OPPOSITION**, via email and by first-class mail, postage prepaid, this 12th day of November, 2021.

**[See Attached Service List]**

---

**Elizabeth B. Prelogar**  
**Solicitor General**  
**Counsel of Record**  
**Department of Justice**  
**Washington, D.C. 20530-0001**  
**(202) 514-2218**

**November 12, 2021**

Due to the continuing delay in receiving incoming mail at the Department of Justice, in addition to mailing your brief via first-class mail, we would appreciate a fax or email copy of your brief. If that is acceptable to you, please fax your brief to Charlene Goodwin, Supervisor, Case Management Specialist, Office of the Solicitor General, at (202) 514-8844, or email at [SupremeCtBriefs@USDOJ.gov](mailto:SupremeCtBriefs@USDOJ.gov). Ms. Goodwin's phone number is (202) 514-2218. Thank you for your consideration of this request.

21-5634  
FORBES, MICHAEL D.  
USA

FREDERICK WILLIAM ULRICH  
FEDERAL PUBLIC DEFENDER'S OFFICE  
100 CHESTNUT STREET  
3RD FLOOR  
HARRISBURG, PA 17101  
717-782-2237  
FRITZ\_ULRICH@FD.ORG