

IN THE  
**SUPREME COURT  
OF THE UNITED STATES**

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MICHAEL D. FORBES,  
*Petitioner,*

v.

UNITED STATES OF AMERICA,  
*Respondents*

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On Petition for a Writ of *Certiorari* to the  
United States Court of Appeals for the Third Circuit

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**CERTIFICATE OF SERVICE  
REPLY BRIEF OF PETITIONER**

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November 22, 2021

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I, Frederick W. Ulrich, Esquire, a member of the Bar of this Court, hereby certify that on this 22nd day of November, 2021, copies of the Reply Brief of Petitioner in the above-captioned case were hand delivered and/or mailed, first-class postage prepaid, to the following:

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I further certify that I am a member of the Bar of this Court and that all parties required to be served have been served.

Respectfully submitted,

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Date: November 22, 2021