

IN THE
SUPREME COURT
OF THE UNITED STATES

MICHAEL D. FORBES,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondents

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

CERTIFICATE OF SERVICE
REPLY BRIEF OF PETITIONER

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November 22, 2021

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,

/s/ Frederick W. Ulrich
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