

No. \_\_\_\_\_

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## In the Supreme Court of the United States

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Rory Lee Zirkelbach, Petitioner,

v.

United States of America, Respondent.

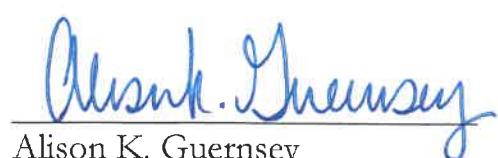
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### CERTIFICATE OF SERVICE

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I, Alison K. Guernsey, an attorney appointed to represent the Petitioner and a member of the Bar of this Court, certify that, on December 17, 2021, I served the Petition for Writ of Certiorari and accompanying Motion for Leave to Proceed In Forma Pauperis on all parties required to be served under Supreme Court Rule 29.4(a). I completed service by causing a copy of the documents to be enclosed in an envelope and be delivered to Federal Express for delivery within 3 calendar days, and by causing an electronic version of the documents to be transmitted via email to:

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