No. 21-68 In the Supreme Court of the United States

BRENDON JANIS,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF SERVICE

I, Adam G. Unikowsky, hereby certify that I am a member of the Bar of this Court, and that I have this 22nd day of October 2021, caused three copies of the Reply Brief in Support of Petition for a Writ of Certiorari to be served via overnight mail and an electronic version of the document to be transmitted via the Court's electronic filing system to:

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/s/ Adam G. Unikowsky Adam G. Unikowsky