

Case No.

IN THE SUPREME COURT OF THE UNITED STATES

UNITED STATES OF AMERICA,  
Plaintiff-Appellee,

v.

ERICA UMBAY,  
Defendant-Appellant.

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**PROOF OF SERVICE**

I, Fay Arfa, a member of the bar of this Court, certify pursuant to Rule 29 of this Court, that on January 4, 2022, I served the **PETITION FOR WRIT OF CERTIORARI; FINANCIAL AFFIDAVIT** on counsel for respondent by depositing a copy in the United States mail at Los Angeles, CA, first-class postage prepaid, addressed or served via electronic service as follows:

Solicitor General of the United States  
Department of Justice, Room 5614  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530

U.S. Attorney's Office - Eastern District  
Justin L. Lee, AUSA  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
[justin.lee@usdoj.gov](mailto:justin.lee@usdoj.gov)

All parties required to be served have been served.

I declare under penalty of perjury that the foregoing is true and correct. Dated this January 4, 2022

*/s Fay Arfa*

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