

No. 22-177

IN THE
Supreme Court of the United States

MONICA TOTH,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF SERVICE

I hereby certify that I am a member in good standing of the bar of this Court and that on this 28th day of September, 2022, I caused three copies of the Brief of Professor Beth A. Colgan as *Amicus Curiae* in Support of Petitioner to be served by third-party commercial carrier on the counsel identified below, and caused an electronic version to be transmitted to the counsel identified below, pursuant to Rule 29.5 of the Rules of this Court. All parties required to be served have been served.

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