Nos. 22-23 and 22-331 IN THE Supreme Court of the United States

JEAN FRANCOIS PUGIN,

Petitioner,

v.

MERRICK B. GARLAND,

Attorney General.

MERRICK B. GARLAND, ATTORNEY GENERAL, *Petitioner*,

v.

FERNANDO CORDERO-GARCIA,

Respondent.

CERTIFICATE OF SERVICE

I, Michelle S. Kallen, hereby certify that I am a member of the Bar of this Court, and that I have this 24th day of March 2023, caused three copies of the Brief of Amici Curiae Criminal Law Scholars in Support of Petitioner Pugin and Respondent Cordero-Garcia to be served via overnight mail and an electronic version of the document to be transmitted via the Court's electronic filing system and email to:

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