

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

KENNETH R. SPIRITO,
Petitioner,
v.

UNITED STATES OF AMERICA,
Respondent.

On Petition for Writ of Certiorari
to the United States Court of Appeals
for the Fourth Circuit

CERTIFICATE OF SERVICE

I, Erin M. Harrigan, counsel for the Petitioner, hereby certify pursuant to Sup. Ct. R. 29(3) that on September 26, 2022, I caused three copies of the Petition for a Writ of Certiorari to the Fourth Circuit to be served by overnight delivery and electronic mail on the following counsel:

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Respectfully submitted,

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