

IN THE SUPREME COURT OF THE UNITED STATES

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MICHAEL K. HOWARD	)
	)
Petitioner,	)
	)
v.	) No.
	)
UNITED STATES	)
	)
Respondent.	)

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CERTIFICATE OF SERVICE

I hereby certify that on this 11<sup>th</sup> day of April, 2023, a true copy of the foregoing Petition for a Writ of Certiorari, In Forma Pauperis Motion and Certificate of Service were mailed, first class, postage prepaid, to the Solicitor General of the United States, Room 5614, United States Department of Justice, 950 Pennsylvania Ave., N.W., Washington, D.C. 20530-0001.

Respectfully submitted,

  
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/S/   
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