

No. 22-7756

IN THE SUPREME COURT OF THE UNITED STATES

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ANDRE ZENO, PETITIONER

v.

UNITED STATES OF AMERICA

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**CERTIFICATE OF SERVICE**

It is hereby certified that all parties required to be served have been served with copies of the **MEMORANDUM FOR THE UNITED STATES**, via e-mail and first-class mail, postage prepaid, this 11th day of August, 2023.

**[See Attached Service List]**

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**August 11, 2023**

Due to the continuing delay in receiving incoming mail at the Department of Justice, in addition to mailing your brief via first-class mail, we would appreciate a fax or email copy of your brief. If that is acceptable to you, please fax your brief to Charlene Goodwin, Supervisory Case Management Specialist, Office of the Solicitor General, at (202) 514-8844, or email at **SupremeCtBriefs@USDOJ.gov**. Ms. Goodwin's phone number is (202) 514-2217 or 2218.

22-7756  
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