

**No. 22-7871**

IN THE  
SUPREME COURT OF THE UNITED STATES

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*In re MICHAEL BOWE,*

*Petitioner.*

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**CERTIFICATE OF SERVICE**

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I certify that on this 6th day of December 2023, in accordance with SUP. CT. R. 29, copies of the (1) Reply Brief for Petitioner, and (2) Certificate of Service were served by third party commercial carrier for delivery within three days upon the United States Attorney for the Southern District of Florida, 99 N.E. 4th Street, Miami, Florida 33132-2111, and upon the Solicitor General of the United States, Room 5614, Department of Justice, 950 Pennsylvania Avenue, N.W., Washington, D.C. 20530-0001.

MICHAEL CARUSO  
Federal Public Defender

Ft. Lauderdale, Florida  
December 6th, 2023

By: /s/ Andrew L. Adler  
Andrew L. Adler  
Assistant Federal Public Defender  
1 E. Broward Blvd., Suite 1100  
Ft. Lauderdale, FL 33301  
(954) 356-7436