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No. 23-370

PAUL ERLINGER,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

AFFIDAVIT OF SERVICE

I HEREBY CERTIFY that on January 10, 2024, three (3) copies of the BRIEF FOR AMICUS CURIAE THE NATIONAL ASSOCIATION OF CRIMINAL DEFENSE LAWYERS IN SUPPORT OF PETITIONER in the above-captioned case were served, as required by U.S. Supreme Court Rule 29.5(c), on the following:

JEFFREY L. FISHER O'MELVENY & MYERS LLP 2765 Sand Hill Road Menlo Park, CA 94025 (650) 724-7081

Party name: Paul Erlinger

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Party name: Court-appointed amicus curiae in support of the judgment below

Party name: United States

The following email addresses have also been served electronically:

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I further certify that all parties required to be served have been served.

GUSTANO MARULANDA

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Sworn to and subscribed before me this 10th day of January 2024

All Allen Als and

ALAN JAMES SMITH NOTARY PUBLIC District of Columbia

My commission expires September 30, 2027.