In the Supreme Court of the United States

No. 23-370

PAUL ERLINGER, PETITIONER

v.

UNITED STATES, RESPONDENT

CERTIFICATE OF SERVICE

I, Amy Mason Saharia, counsel for amicus curiae FAMM and a member of the Bar of this Court, certify that, on January 10, 2024, the amicus brief for FAMM was sent, by third-party commercial carrier for delivery overnight and via electronic mail, to the following counsel:

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

/s/ Amy Mason Saharia Amy Mason Saharia