In the Supreme Court of the United States

DEVON ARCHER,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

CERTIFICATE OF SERVICE

I, Jeffrey C. Thalhofer, a member of the Bar of this Court, hereby certify that on this 20th day of November, 2023, I caused to be served by overnight carrier 3 copies of the Brief of Procedure Scholars as Amici Curiae in Support of Certiorari on each of the following counsel:

Matthew Lane Schwartz Boies Schiller Flexner 55 Hudson Yards, 20th Floor New York, NY 10001 mlschwartz@bsfllp.com Party name: Devon Archer

Solicitor General Elizabeth B. Prelogar United States Department of Justice 950 Pennsylvania Ave., NW Washington, DC 20530-0001 Supremectbriefs@usdoj.Gov Party name: United States I further certify that all parties required to be served have been served.

Jeffrey C. Thalhofer

November 20, 2023