

No. 23-666

IN THE SUPREME COURT OF THE UNITED STATES

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JAMES T. CUNNINGHAM, 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 IN OPPOSITION** via email and by first-class mail, postage prepaid, this 20<sup>TH</sup> day of February, 2024.

[See Attached Service List]

As required by Supreme Court Rule 33.1(h), I certify that the document 361 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct. Executed on February 20, 2024

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**February 20, 2024**

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, Supervisor, Case Management Specialist, Office of the Solicitor General, at (202) 514-8844, or email at [SupremeCtBriefs@USDOJ.gov](mailto:SupremeCtBriefs@USDOJ.gov). Ms. Goodwin's phone number is (202) 514-2218. Thank you for your consideration of this request.

23-0666

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