In the Supreme Court of the United States

Michael Avenatti,

Petitioner,

v.

United States of America,

Respondent.

CERTIFICATE OF SERVICE

I have caused a copy of the Reply Brief to be served by Federal Express and via email on Elizabeth Prelogar, Solicitor General of the United States, Department of Justice, 950 Pennsylvania Avenue, N.W., Room 5614, Washington, D.C. 20530-0001.

Dated: New York, New York April 30, 2024

> /s/ Daniel Habib Counsel of Record

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