

No. 24-5438

IN THE SUPREME COURT OF THE UNITED STATES

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MICHAEL BOWE, 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 **BRIEF FOR THE UNITED STATES**, via email and first-class mail, postage prepaid, this 11<sup>th</sup> day of June 2025.

**[See Attached Service List]**

As required by Supreme Court Rule 33.1(h), I certify that the document contain **12,899** 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 June 11, 2025.

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June 11, 2025

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, Case Management Supervisor, Office of the Solicitor General, at (202) 514-8844, or email at **SupremeCtBriefs@USDOJ.gov**. Ms. Goodwin's phone number is (202) 514-2217 or 2218. Thank you for your consideration of this request.

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