

**No. 24-5615**

MERL SIMPSON,

*Petitioner,*

*v.*

UNITED STATES OF AMERICA,

*Respondent.*

**CERTIFICATE OF SERVICE**

Pursuant to Supreme Court Rule 29.5(a), I certify ten (10) copies of the Reply Brief for Petitioner were hand-delivered by courier to the U.S. Supreme Court on January 21, 2025. Additionally, one (1) copy of the Reply Brief for Petitioner was sent to counsel by overnight Fed-Ex, as well as by transmitting a digital copy via electronic mail.

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