

**CERTIFICATE OF SERVICE**

No. 17-155

Erik Lindsey Hughes,

*Petitioner,*

v.

United States of America,

*Respondent.*

I, Jean-Claude André, do hereby certify that, on this twenty-ninth day of January, 2018, I caused three copies and an electronic copy of the Brief Of Amicus Curiae Professor Douglas A. Berman In Support Of Petitioner in the foregoing case to be served by overnight commercial carrier, and by email, on the following parties:

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