

No. 19-783

IN THE
Supreme Court of the United States

NATHAN VAN BUREN,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF SERVICE

I, Clifford W. Berlow, hereby certify that I am a member of the bar of this Court and that I have this 17th day of January, 2020, caused three copies of the foregoing Brief of the National Association of Criminal Defense Lawyers as *Amicus Curiae* in Support of Petitioner to be served via electronic mail and UPS overnight delivery, postage prepaid on:

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