
IN THE
Supreme Court of the United States

DEVON ARCHER,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

CERTIFICATE OF SERVICE

I, Brandon L. Arnold, a member of the Bar of this Court, certify that on this 25th day of June, 2021, I caused to be served by U.S. Mail three copies of the Brief of Procedure Scholars as *Amici Curiae* in Support of Certiorari on each of the following counsel:

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I further certify that all parties required to be served have been served.



Brandon L. Arnold