

No. 20-437

IN THE SUPREME COURT OF THE UNITED STATES

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UNITED STATES OF AMERICA, PETITIONER

v.

REFUGIO PALOMAR-SANTIAGO

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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 **REPLY BRIEF FOR THE UNITED STATES**, via e-mail and first-class mail, postage prepaid, this 16<sup>TH</sup> day of April, 2021.

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As required by Supreme Court Rule 33.1(h), I certify that the document contains 5983 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 **April 16, 2021**.

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**April 16, 2021**

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