

No. 20-444
IN THE
Supreme Court of the United States

UNITED STATES OF AMERICA,
Petitioner,

v.

MICHAEL ANDREW GARY,
Respondent.

CERTIFICATE OF SERVICE

I, David Bitkower, hereby certify that I am a member of the Bar of this Court, and that I have this 25th day of March 2021, caused three copies of the Brief of National Association of Criminal Defense Lawyers as *Amicus Curiae* in Support of Respondent to be served via overnight mail and an electronic version of the document to be transmitted via the Court's electronic filing system to:

Elizabeth B. Prelogar
Acting Solicitor General
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
(202) 514-2217
SupremeCtBriefs@USDOJ.gov

Counsel for United States

Jeffrey L. Fisher
Stanford Law School Supreme Court
Litigation Clinic
559 Nathan Abbott Way
Stanford, CA 94305-8610
(650) 724-7081
jlfisher@law.stanford.edu

Counsel for Michael Andrew Gary

/s/ David Bitkower
David Bitkower