

No. 20-579

**In the Supreme Court of the United States**

ZIMMIAN TABB, PETITIONER,

*v.*

UNITED STATES OF AMERICA

**CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with Supreme Court Rule 29 and this Court's Order of April 15, 2020, all parties required to be served have been served with copies of the foregoing **REPLY BRIEF FOR THE PETITIONER**, via e-mail, this 2nd day of March 2021. All parties had previously consented to electronic service consistent with this Court's order of April 15, 2020

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I declare under penalty of perjury the foregoing is true and correct. Executed on March 2, 2021.

/s John P. Elwood  
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March 2, 2021