

In the Supreme Court of the United States

MARK E. PULSIFER,

Petitioner,

v.

UNITED STATES,

Respondent.

CERTIFICATE OF SERVICE

As required by Supreme Court Rule 29.3 and 29.5, I hereby certify that three copies of the Supplemental Brief for Petitioner in *Mark Pulsifer v. United States*, S. Ct. No. 22-340, were served via overnight delivery and email on counsel for Respondent:

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I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 22, 2023



Shay Dvoretzky
