

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

MARK E. PULSIFER,

*Petitioner,*

*v.*

UNITED STATES,

*Respondent.*

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**CERTIFICATE OF SERVICE**

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As required by Supreme Court Rule 29.3 and 29.5, I hereby certify that three copies of the Reply 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: August 23, 2023

  
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Shay Dvoretzky

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