

No. 22-6640

IN THE
Supreme Court of the United States

EUGENE JACKSON,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF SERVICE

I, Douglas E. Litvack, hereby certify that I am a member of the bar of this Court and that I have this 27th day of February, 2023, caused three copies of the foregoing Brief of *Amicus Curiae* Clause 40 Foundation in Support of Petitioner to be served via UPS overnight delivery, postage prepaid and one pdf copy to be served via electronic mail on:

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