

**CERTIFICATE OF SERVICE**

No. 23-5572

Joseph W. Fischer,

*Petitioner,*

v.

United States of America,

*Respondent.*

I, Frederick W. Ulrich, do hereby certify that, on this twenty-eighth day of March, 2024, I caused three copies and an electronic copy of the Petitioner's Reply Brief in the foregoing case to be served by first class mail, postage prepaid, and by email, on the following party:

ELIZABETH B. PRELOGAR  
SOLICITOR GENERAL  
UNITED STATES DEPARTMENT OF  
JUSTICE  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001  
(202) 514-2217  
supremectbriefs@usdoj.gov

*Counsel for Respondent*

/s/ Frederick W. Ulrich  
FREDERICK W. ULRICH  
Federal Public Defender's Office  
100 Chestnut Street, 3rd Fl.  
Harrisburg, PA 17101  
(717) 782-2237