

No. 23—__

In the
Supreme Court of the United States

Michael Avenatti,
Petitioner,

v.

United States of America,
Respondent.

CERTIFICATE OF SERVICE

I have caused a copy of the Petition for a Writ of Certiorari, and an Application for Leave to Proceed *In Forma Pauperis*, to be served by Federal Express and via email on Elizabeth Prelogar, Solicitor General of the United States, Department of Justice, 950 Pennsylvania Avenue, N.W., Room 5614, Washington, D.C. 20530-0001.

Dated: New York, New York
February 12, 2024

/s/ Daniel Habib
Counsel of Record

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