

IN THE SUPREME COURT OF THE UNITED STATES

No. 24-1084

STEVEN M. HOHN, PETITIONER

v.

UNITED STATES OF AMERICA

CERTIFICATE OF SERVICE

I, Kannon K. Shanmugam, counsel for petitioner and a member of the Bar of this Court, certify that, on September 24, 2025, three copies of the Reply Brief for the Petitioner in the above-captioned case were sent, by third-party commercial carrier for delivery overnight and by electronic mail, to the following counsel:

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I further certify that all parties required to be served have been served.

Kannon K. Shanmugam