

CERTIFICATE OF SERVICE

No. 24-5438

MICHAEL BOWE,
Petitioner,
v.

UNITED STATES OF AMERICA,
Respondent.

I, Kwaku A. Akowuah, do hereby certify that, on this fourteenth day of April, 2025, I caused three copies and an electronic copy of the Brief of Amici Curiae Habeas Scholars in Support of Petitioner in the foregoing case to be served by first class mail, postage prepaid, and by email, on the following parties:

ANDREW LEE ADLER
FEDERAL PUBLIC DEFENDER'S OFFICE
One East Broward Blvd.
Suite 1100
Fort Lauderdale, FL 33301
(954) 356-7436
andrew_adler@fd.org

Counsel for Petitioner

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

Counsel for Respondent

KASDIN M. MITCHELL
KIRKLAND & ELLIS LLP
4550 Travis Street
Dallas, TX 75225
(202) 389-5165
kasin.mitchell@kirkland.com

*Counsel for Court-appointed Amicus
Curiae*

/s/ Kwaku A. Akowuah
KWAKU A. AKOWUAH
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8000