

IN THE
Supreme Court of the United States

MICHAEL BOWE,
Petitioner,
v.

UNITED STATES,
Respondent.

ON WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

CERTIFICATE OF SERVICE

I, Gary M. Fox, a member of the bar of this Court, hereby certify that, on this 14th day of April, 2025, all parties required to be served have been served copies of the Brief for The National Association of Criminal Defense Lawyers as Amicus Curiae in Support of Petitioner in this matter by overnight courier to the addresses on the attached service list.

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