

STATE OF NEW YORK            )  
COUNTY OF NEW YORK        ) SS

James Pacheco, Being duly sworn, deposes and says that deponent is not party to the action, and is over 18 years of age.

That on 4/14/2025 deponent caused to be served 3 copy(s) of the within

**Brief of Federal Courts Scholars as Amici Curiae in Support of Petitioner**

upon the attorneys at the address below, and by the following method:

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*Kevin Ayala*

**Sworn to me this**

Monday, April 14, 2025

KEVIN AYALA  
Notary Public, State of New York  
No. 01AY6207038  
Qualified in New York County  
Commission Expires 7/13/2025

**Case Name:** Michael Bowe v. United States

**Docket/Case No:** 24-5438

**Index:**

*James Pacheco*