

**CERTIFICATE OF SERVICE**

No. 24-5438

MICHAEL BOWE,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

Respondent.

I, Stephanie N. O'Banion, a member of the Bar of this Court, hereby certify that, on this 4th day of August, 2025, all parties required to be served have been served copies of the Motion for Leave to File and the accompanying Brief of Amicus Curiae Stephanie N. O'Banion, as required by Supreme Court Rule 29.5(c), to the addresses on the attached service list. The motion and accompanying brief are submitted in lieu of the Brief of Amicus Curiae Stephanie N. O'Banion submitted to the Court on July 2, 2025.

/s/ Stephanie N. O'Banion

STEPHANIE N. O'BANION

*Counsel of Record*

O'BANION LAW LLC

201 E. Fifth St.

Suite 1900

Cincinnati, Ohio 45202

stephanie@obanionlawllc.com

513-520-2626

## SERVICE LIST

### ***Counsel for Petitioner***

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 Respondent***

DEAN JOHN SAUER  
*Solicitor General*  
UNITED STATES DEPARTMENT OF JUSTICE  
Room 5616  
950 Pennsylvania Ave., NW  
Washington, DC 20530-0001  
(202) 514-2217  
SupremeCtBriefs@USDOJ.gov

### ***Counsel for Court-Appointed Amicus***

KASDIN M. MITCHELL  
KIRKLAND & ELLIS LLP  
4550 Travis Street  
Dallas, TX 75205  
(202) 389-5165  
kasdin.mitchell@kirkland.com