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Washington, D.C. 20002

No. 24-5438

MICHAEL BOWE,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

## AFFIDAVIT OF SERVICE

I HEREBY CERTIFY that on September 22, 2025, three (3) copies of the REPLY BRIEF FOR PETITIONER in the above-captioned case were served, as required by U.S. Supreme Court Rule 29.5(c), on the following:

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Sworn to and subscribed before me this 22nd day of September 2025.

AZA SALINDER DONNER NOTARY PUBLIC

District of Columbia

My commission expires April 30, 2029.