

**NO. 25-5179**

**IN THE UNITED STATES SUPREME COURT**

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**GERALD LYNN CAMPBELL,  
Petitioner,**

**v.**

**UNITED STATES OF AMERICA,  
Respondent.**

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**ON PETITION FOR WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT**

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**SUPPLEMENT TO  
PETITION FOR WRIT OF CERTIORARI**

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Erin P. Rust  
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Attorney for Gerald Campbell

The petitioner, through counsel, respectfully provides the following supplement to his petition for certiorari:

Earlier today, September 26, 2025, the Court docketed as Case Number 25-5743, a petition for writ of certiorari, filed by petitioner Rico Lorodge Brown. Mr. Brown's case arises from the United States Court of Appeals for the Fourth Circuit and raises the same two questions presented as Mr. Campbell.

The Fourth Circuit's opinion in Mr. Brown's case is discussed in detail in Mr. Campbell's petition, as it is the leading case on one side of the circuit split on the second question presented in both petitions—what is the applicable showing the government must make if harmless-error review applies to a preserved claim of error under *Erlinger v. United States*, 602 U.S. 821 (June 21, 2024).

Accordingly, the Court should either grant Mr. Campbell's petition for certiorari or hold Mr. Campbell's petition pending its review of Mr. Brown's.

Respectfully submitted,

FEDERAL DEFENDER SERVICES  
OF EASTERN TENNESSEE, INC.

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