IN THE SUPREME COURT OF THE UNITED STATES

JONATHAN R. HOWARD,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FIFTH CIRCUIT

PROOF OF SERVICE

I, Kevin Joel Page, do certify that on this date, November 3, 2025, pursuant to Supreme Court Rules 29.3 and 29.4, I have served the attached Reply in Support of Petition for a Writ of Certiorari on each party to the above proceeding, or that party's counsel, and on every other person required to be served. I have served the Supreme Court of the United States via Federal Express, overnight. The Solicitor General and the petitioner were each served by depositing an envelope containing the above documents in the United States mail properly addressed to each of them and with first-class postage prepaid. Assistant United States Attorney Stephen Gilstrap has been served by email, per his request.

The names and addresses of those served are as follows:

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