In the Supreme Court of the United States

DAVID CURRAN,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF SERVICE

The undersigned, appointed to represent respondent pursuant to the Criminal Justice Act, 18 U.S.C. § 3006A, hereby certifies that as required by Rule 29.3 and 29.4(a), he has served the enclosed Motion for Leave to Proceed *In Forma Pauperis* and the Petition for Writ of Certiorari on counsel for the opposing party, the United States of America, by first-class mail, on September 2, 2025. Delivery was made to:

Solicitor General of the United States Room 5615, Department of Justice 950 Pennsylvania Avenue, N.W. Washington, D.C. 20530-0001

Counsel for Petitioner.