

IN THE SUPREME COURT OF THE UNITED STATES

TITLE, MICHAEL LEON
Petitioner

vs.

No: 25-5844

USA

WAIVER

The Government hereby waives its right to file a response to the petition in this case, unless requested to do so by the Court.

D. JOHN SAUER
Solicitor General
Counsel of Record

October 24, 2025

cc:

MICHAEL LEON TITLE
PRISONER ID. NO. 19495-086
P.O. BOX 34550
MEMPHIS, TN 38184