

IN THE SUPREME COURT OF THE UNITED STATES

ZENO SIMS,	)	
	)	
Petitioner,	)	
	)	On Petition for Writ of
vs.	)	Certiorari to the Eighth
	)	Circuit Court of Appeals
DORIS FALKENRATH,	)	
	)	
Respondent.	)	

**PROOF OF SERVICE**

I hereby certify that on October 10, 2025, in compliance with Supreme Court Rule 29.3, I served a copy of the following documents upon counsel for the respondent: Petition for Writ of Certiorari to the United States Court of Appeals for the Eighth Circuit; Motion to Proceed in Forma Pauperis and Affidavit; and Proof of Service.

Such service was obtained by mailing documents via first class mail with postage fully prepaid and properly affixed thereto at Clayton, Missouri, addressed to:

Catherine L. Hanaway  
Missouri Attorney General  
Supreme Court Building  
207 W. High St.  
P.O. Box 899  
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Respectfully submitted,

/s/ Kevin L. Schriener

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Dated this 10th day of October, 2025.