

IN THE SUPREME COURT OF THE UNITED STATES

ZENO SIMS,)
)
Petitioner,)
)
vs.)
)
DORIS FALKENRATH,)
)
Respondent.)

On Petition for Writ of
Certiorari to the Eighth
Circuit Court of Appeals

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.