

IN THE
Supreme Court of the United States

RICHARD RUSTON,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

**On Petition for a Writ of Certiorari to the
United States Court of Appeals for the Tenth Circuit**

CERTIFICATE OF SERVICE

I, Ephraim A. McDowell, a member of the bar of this Court, hereby certify that, on May 5, 2026, all parties required to be served have been served. Three (3) copies of the Reply Brief for the Petitioner in the above-captioned case were deposited via first class mail for delivery to counsel identified below.

I further certify that an electronic copy was served via e-mail on the following parties:

D. JOHN SAUER
SOLICITOR GENERAL
UNITED STATES DEPARTMENT OF JUSTICE
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
(202) 514-2217
supremectbriefs@usdoj.gov

Counsel for Respondent

/s/ Ephraim A. McDowell

EPHRAIM A. MCDOWELL
COOLEY LLP
1299 Pennsylvania Ave., NW
Suite 700
Washington, DC 20004
(202) 842-7800
emcdowell@cooley.com
