

No. \_\_\_\_\_

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IN THE SUPREME COURT OF THE UNITED STATES

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JARRETT HOWARD, Petitioner,

v.

UNITED STATES OF AMERICA, Respondent,

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PROOF OF SERVICE

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I certify that on December 9, 2025, I served the petitioner's motion for leave to proceed in forma pauperis, petition for writ of certiorari to the United States Court of Appeals for the Sixth Circuit, and certificate of word count by mailing one copy of each pleading by first class mail in an envelope addressed to:

Solicitor General of the United States  
Attorney for Respondent  
Department of Justice, Room 5614  
950 Pennsylvania Avenue, NW  
Washington, D.C. 20530-0001  
[SupremeCtBriefs@usdoj.gov](mailto:SupremeCtBriefs@usdoj.gov)

I also sent a copy of these pleadings in PDF format by e-mail using the Court's electronic filing system on the same date to:

Solicitor General of the United States  
Attorney for Respondent  
[SupremeCtBriefs@usdoj.gov](mailto:SupremeCtBriefs@usdoj.gov)

Dated: December 9, 2025

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Kenneth P. Tableman