

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

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IN THE  
SUPREME COURT OF THE UNITED STATES  
OCTOBER TERM, 2025

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DONNIE BRYANT, *Petitioner*,

v.

UNITED STATES OF AMERICA, *Respondent*.

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On Petition for Writ of Certiorari to the  
United States Court of Appeals  
for the Ninth Circuit

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**CERTIFICATE OF SERVICE**

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Angela H. Dows, counsel of record for Petitioner Donnie Bryant, appointed pursuant to the Criminal Justice Act of 1964, 18 U.S.C. § 3006A, hereby certifies that pursuant to Supreme Court Rule 29(5)(b) on this eleventh day of January, 2026, the preceding Petition for Writ of Certiorari to the United States Supreme Court of Appeals for the Ninth Circuit and the accompanying Motion for Leave to Proceed In Forma Pauperis were served on counsel for the Respondent and the Court by enclosing a copy of these documents in an envelope, first-class postage prepaid or by delivery to a third party commercial carrier for delivery within 3 calendar days, and addressed to:

D. John Sauer  
Office of the Solicitor General  
950 Pennsylvania Ave. NW  
Washington, D.C. 20530-0001

Clerk of Court  
Supreme Court of the United States  
1 First Street, N.E.  
Washington, D.C. 20543

It is further certified that all parties required to be served have been served.

Dated: January 11, 2026.

Respectfully submitted,

s/ Angela H. Dows  
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