

NO. _____

IN THE

Supreme Court of the United States

Erica Garner, Petitioner

V.

UNITED STATES OF AMERICA, Respondent

Proof of Service

I have caused a copy of the Petition for Writ of Certiorari, and a Motion For Leave to Proceed *In Forma Pauperis* to be served electronically and via United States Postal Service Overnight on D. John Sauer, Solicitor General of the United States, Department of Justice, 950 Pennsylvania Ave. NW., Room 5614, Washington DC 20530-0001 on this the 2nd day of March, 2026



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