

No. 25-848

IN THE SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 2025

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STATE OF ALABAMA,

Petitioner,

v.

MICHAEL ANTHONY POWELL,

Respondent.

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PROOF OF SERVICE

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I, Angela L. Setzer, a member of the Bar of this Court, certify that on February 17, 2026, as required by Supreme Court Rule 29, I served a copy of the enclosed Brief in Opposition to the State of Alabama’s Petition for Writ of Certiorari to the Alabama Court of Criminal Appeals and Motion to Proceed *In Forma Pauperis* on the Alabama Attorney General’s Office by depositing these documents in the United States mail, with first class postage pre-paid and properly addressed to:

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A. Barrett Bowdre  
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Respectfully Submitted,

/s/ Angela L. Setzer

ANGELA L. SETZER

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February 17, 2026

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