

In the Supreme Court of the United States

No.

MICHAEL J. MADIGAN, PETITIONER

v.

UNITED STATES OF AMERICA, RESPONDENT

CERTIFICATE OF SERVICE

I, Lisa S. Blatt, counsel for petitioner and a member of the Bar of this Court, certify that, on July 27, 2026, the Petition for a Writ of Certiorari was sent, by third-party commercial carrier for delivery overnight and via electronic mail, to the following counsel:

D. John Sauer
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U.S. Department of Justice
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I further certify that all parties required to be served have been served.

/s/ Lisa S. Blatt

LISA S. BLATT