In the Supreme Court of the United States

No. 26-137

MICHAEL J. MADIGAN,
PETITIONER,

v.

UNITED STATES OF AMERICA,
RESPONDENT.

CERTIFICATE OF SERVICE

I, Lisa S. Blatt, counsel for petitioner Michael J. Madigan and a member of the Bar of this Court, certify that, on November 16, 2026, the Reply Brief of Petitioner was sent, by third-party commercial carrier for delivery overnight and via electronic mail, to the following counsel:

D. John Sauer
United States Department of Justice
950 Pennsylvania Ave., N.W.
Washington, DC 20530
SupremeCtBriefs@usdoj.gov

I further certify that all parties required to be served have been served.

/s/ *Lisa S. Blatt*
LISA S. BLATT