

IN THE SUPREME COURT OF THE UNITED STATES
OCTOBER TERM 2025

CASE NO. _____

PHILLIP TIMOTJY HOWARD,
Petitioner,

vs.

PROOF OF SERVICE

THE UNITED STATES OF AMERICA,
Respondent
_____ /

Counsel for Petitioner certifies that a copy of the Petition for Writ of Certiorari, Notice of Appearance, Motion to Proceed *in Forma Pauperis*, Certificate of Word Count, and this Proof of Service were served by US Mail on JULY 6, 2026, on the Clerk of Court and all parties required to be served, Office of the Solicitor General, U.S. Department of Justice, Washington, D.C. 20530, and electronically to the Clerk of Court, and to SupremeCtBriefs@USDOJ.gov.

Respectfully submitted,

/s/ Sheryl J. Lowenthal

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