

No. 26-5164

IN THE
Supreme Court of the United States

ROBERT MICHAEL FALL,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

PROOF OF SERVICE

I, Robert Michael Fall, hereby certify that on September 29, 2026, I served the foregoing Supplemental Brief for Petitioner on the following, by dispatching copies, delivery prepaid, to a third-party commercial carrier (Federal Express) for delivery within three calendar days, addressed as follows:

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All parties required to be served have been served. I declare under penalty of perjury that the foregoing is true and correct. 28 U.S.C. § 1746.

Respectfully submitted,



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Dated: September 29, 2026