

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

JOSEPH ZIELER
Petitioner,

v.

STATE OF FLORIDA
Respondent.

CERTIFICATE OF SERVICE

I, Steven L. Bolotin, a member of the Bar of this Court, hereby certify that on September 14, 2026, a copy of the enclosed Motion for Leave to Proceed In Forma Pauperis and Petition For a Writ of Certiorari was mailed, first class postage prepaid, as well as electronically served via email, on the following counsel:

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

Dated: September 14, 2026

Respectfully submitted,

/s/ Steven L. Bolotin

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