

No. _____

IN THE
Supreme Court of the United States

MICHAEL A. NOLAN,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

**On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Fourth Circuit**

PROOF OF SERVICE

I, Salvatore M. Mancina, an attorney appointed to represent the petitioner under the Criminal Justice Act, 18 U.S.C. § 3006A(d)(7), hereby certify that on this 21st day of September, 2026, all parties required by the Rules of this Court to be served have been served. One copy each of the Petition for a Writ of Certiorari and of the Motion to Leave to Proceed *in Forma Pauperis* in the above-captioned case was sent by Federal Express, two-day delivery, to:

D. John Sauer
Solicitor General
United States Department of Justice
950 Pennsylvania Ave., N.W.
Washington, D.C. 20530-0001
supremectbriefs@usdoj.gov

Counsel for Respondent

I further certify that an electronic copy has been emailed to counsel at the address indicated above.

s/ Salvatore Mancina

September 21, 2026

Salvatore M. Mancina