

Nos. 26-5759 & 26A459

IN THE
Supreme Court of the United States

JAMAAL HOWARD,
Petitioner,

v.

STATE OF TEXAS,
Respondent.

On Petition for Writ of Certiorari to the
Court of Criminal Appeals of Texas

CERTIFICATE OF SERVICE

As required by Supreme Court Rule 29.3, I hereby certify that on the 7th day of October, 2026, a copy of Real Party in Interest's Brief in Opposition was sent via email to Donald Lee Bailey, Attorney at Law, 309 N. Willow, Sherman, TX 75090 (donbailey46@hotmail.com), Counsel for Jamaal Howard. Three copies will also be transmitted to a third-party commercial carrier for delivery within three calendar days. All parties required to be served have been served. I am a member of the Bar of this Court.

s/ Jennifer Wren
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ATTORNEY FOR REAL PARTY IN
INTEREST