

No. \_\_\_\_\_

IN THE  
SUPREME COURT OF THE UNITED STATES

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MICHAEL BOWE,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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**CERTIFICATE OF SERVICE**

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I certify that on this 29th day of August 2024, in accordance with SUP. CT. R. 29, copies of the (1) Petition for Writ of Certiorari, (2) Motion for Leave to Proceed *In Forma Pauperis*, (3) Certificate of Service, and (4) Declaration Verifying Timely Filing, were served by third party commercial carrier for delivery within three days upon the United States Attorney for the Southern District of Florida, 99 N.E. 4th Street, Miami, Florida 33132-2111, and upon the Solicitor General of the United States, Room 5614, Department of Justice, 950 Pennsylvania Avenue, N.W., Washington, D.C. 20530-0001.

HECTOR A. DOPICO  
Interim Federal Public Defender

Ft. Lauderdale, Florida  
August 29th, 2024

By: /s/ Andrew L. Adler  
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