## No. 24-5438

## 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

I certify that, on this 9th day of December 2024, in accordance with Sup. Ct. R. 29, copies of the (1) Reply Brief for Petitioner, and (2) Certificate of Service, 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 Federal Public Defender

Ft. Lauderdale, Florida December 9th, 2024 By: <u>/s/ Andrew L. Adler</u>

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