

No. _____

In the
Supreme Court of the United States

Michael Avenatti,

Petitioner,

v.

United States of America,

Respondent.

CERTIFICATE OF SERVICE

On September 12, 2024, I caused a copy of the Petition for a Writ of Certiorari, the Petitioner's Appendix, and an Application for Leave to Proceed In Forma Pauperis to be served by email (SupremeCtBriefs@USDOJ.gov) and by Federal Express on Elizabeth Prelogar, Solicitor General of the United States, Department of Justice, 950 Pennsylvania Avenue, N.W., Room 5616, Washington, D.C. 20530-0001.

Dated: September 12, 2024

/s/ Kendra L. Hutchinson

Federal Defenders of New York
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