

NO. _____

IN THE SUPREME COURT OF THE UNITED STATES

**BRENT HOWARD,
Petitioner,**

v.

**UNITED STATES OF AMERICA,
Respondent.**

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

CERTIFICATE OF SERVICE

R. Victoria García-Cross appointed under the Criminal Justice Act, certifies that, pursuant to Rule 29.5, served the preceding Petition for Writ of Certiorari and the accompanying Motion for Leave to Proceed *In Forma Pauperis* on counsel for the Respondent (1) by mailing, on January 7, 2025, a copy of these documents (via first-class United States mail, postage prepaid) to:

The Honorable Elizabeth Prelogar
Solicitor General of the United States
Room 5614, Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

and also (2) by sending, on January 7, 2025, the said documents via electronic mail to the Office of the Solicitor General at the following e-mail address: SupremeCtBriefs@USDOJ.gov. She certifies that all parties required to be served have been served.

/s/ R. Victoria García-Cross

R. VICTORIA GARCÍA-CROSS