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November 13, 2017

Honorable Scott S. Harris Clerk of the Court Supreme Court of the United States 1 First Street, NE Washington, DC 20543

Re: Michael N. Currier v. Commonwealth of Virginia, No. 16-1348

Dear Mr. Harris,

This letter confirms petitioner's global consent to the filing of any amicus brief on the merits of this case.

Thank you very much for your time and assistance in this matter.

Very truly yours,

Jeffrey L. Fisher

Counsel for Petitioner

cc: All Counsel