

COMMONWEALTH of VIRGINIA Office of the Attorney General

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March 19, 2019

The Honorable Scott S. Harris, Clerk Supreme Court of the United States Office of the Clerk One First Street, N.E. Washington, D.C. 20543

Re: Mathena v. Malvo, No. 18-217

Dear Mr. Harris:

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

Respectfully yours,

Toby J. Heytens

Solicitor General of Virginia Counsel of Record for Petitioner

cc: Counsel for Respondent