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February 26, 2019

By Federal Express

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

Re: *McDonough v. Smith*, No. 18-485

Dear Mr. Harris:

I represent Edward G. McDonough in the above-referenced matter.

In accordance with Rule 37(3)(a) of the Rules of the Supreme Court of the United States, Petitioner, Edward G. McDonough, hereby grants blanket consent to the filing of *amicus curiae* briefs in support of either or neither party in this matter.

Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Neal Katyal" followed by a flourish and the initials "NCP".

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Counsel for Petitioner

cc: Thomas James O'Connor