

In the Supreme Court of the United States

Robert M. Sellers,

Petitioner,

v.

Denis R. McDonough,
Secretary of Veterans Affairs,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Brief *Amicus Curiae* of Military-Veterans Advocacy Supporting Petitioner filed on behalf of Amicus Curiae Military-Veterans Advocacy, Inc. contains 4,615 words, excluding parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 23rd day of March 2021.

/s/ Michael E. Joffre

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