In The Supreme Court of the United States

No. 20-1148

ROBERT M. SELLERS,

Petitioner,

v.

DENIS R. McDonough, Secretary of Veterans Affairs,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of National Veterans Legal Services Program as *Amicus Curiae* in Support of Petitioner in the above-entitled case contains 5,178 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Date: March 24, 2021.

s/ Teena-Ann Sankoorikal
Teena-Ann Sankoorikal