IN THE SUPREME COURT OF THE UNITED STATES

No. 21-432

ADOLFO R. ARELLANO, PETITIONER

v.

DENIS MCDONOUGH, RESPONDENT

CERTIFICATE OF WORD COUNT

I, Liam J. Montgomery, counsel for *amici curiae* Edgewood Veterans, National Veterans Organizations, Paralyzed Veterans of America, AARP, and AARP Foundation and a member of the Bar of this Court, certify that the amicus brief in support of petitioner in the above-captioned case contains 7,156 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Liam J. Montgomery

May 20, 2022