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March 30, 2023

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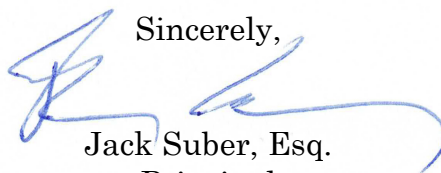
**RE NO. 22-815: VICTOR B. SKAAR V. DENIS R. MCDONOUGH, SECRETARY OF
VETERANS AFFAIRS**

Dear Sir or Madam:

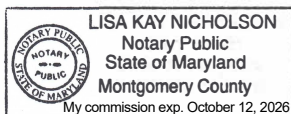
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Civil Procedure and Administrative Law Scholars referenced above contains **5,959** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 30th day of March 2023.

