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March 30, 2023

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

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

Dear Sir or Madam:

I hereby certify that at the request of counsel for *Amici Curiae* Civil Procedure and Administrative Law Scholars on March 30, 2023, I caused service to be made pursuant to Rule 29 on the following counsel for the Petitioner and Respondent:

PETITIONER:

Michael J. Wishnie Jerome N. Frank Legal Services Organization Veterans Legal Services Clinic P.O. Box 209090 New Haven, CT 06520-9090 203-432-4800 michael.wishnie@yale.edu

RESPONDENT:

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This service was effected by depositing three copies of the Brief of *Amici Curiae* in an official "first class mail" receptacle of the United States Post Office as well as by transmitting a digital copy via electronic mail.

Sincerely. Jack Suber, Esq. Principal



State of Maryland

Montgomery County commission exp. October 12, 2026

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

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