In the Supreme Court of the United States

No. 23-713

Joshua E. Bufkin, Petitioner,

v.

DENIS McDonough,
SECRETARY OF VETERANS AFFAIRS,
RESPONDENT.

NORMAN F. THORNTON, PETITIONER,

v.

DENIS McDonough, SECRETARY OF VETERANS AFFAIRS, RESPONDENT.

CERTIFICATE OF WORD COUNT

I, Liam J. Montgomery, counsel for amicus curiae National Veterans Legal Services Program and a member of the Bar of this Court, certify that the amicus brief in the above-captioned case contains 5,987 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Liam J. Montgomery
Liam J. Montgomery

February 2, 2024