

IN THE
Supreme Court of the United States

DAVID FORSYTHE,

Petitioner,

v.

DENIS MCDONOUGH,
SECRETARY OF VETERANS AFFAIRS,

Respondent.

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Pursuant to Supreme Court Rule 33(h), I hereby certify that the Brief of the Separation of Powers Clinic as Amicus Curiae in Support of Petitioner contains 3372 words, excluding parts of the document exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

Executed February 20, 2024

_____/s/ R. Trent McCotter_____
R. Trent McCotter
Counsel of Record