Paul C. Saunders:

Let me now welcome and introduce our keynote speakers who are going to have a conversation on the subject of government lawyers as guardians of the rule of law. And let me begin by asking them to comment on something that my predecessor in this job, the distinguished lawyer, Lou Craco said in an address that he gave at the Pace Law School some years ago. Lou said that when lawyers give independent and candid legal advice, which they're required to do by the code of professional conduct, they are quintessentially delivering the rule of law to their clients.

Paul C. Saunders:

And Lou quoted David Wilkins, the distinguished professor at Harvard, by saying that what lawyers should do, must do, is to tell their clients what they must know, not what they want to know. Not the advice that they want to receive. They should be given the advice that they must receive. And let me turn this over to our distinguished guests, both Paul Clement and Neal Katyal, both of whom led the Office of Solicitor General. Both of whom worked in the Department of Justice. Both of whom are professors at Georgetown Law School. And despite the fact that they are sometimes on opposite sides of a given issue, they are the closest of friends. So let me welcome Paul Clement and Neal Katyal.

Paul D. Clement:

Thank you, Paul. It's great to be here, and it's great to be here with Neal. And in the spirit of friendship, I'll let Neal take the first crack at your wonderful question.

Neal Katyal:

Well, thanks, Paul. It is really a delight to be here with you, Paul Clement and Paul Saunders. I hold many titles, but the title I am proudest of is that I am the Paul Saunders Professor of Law at Georgetown. And it is such an privilege to be associated with you in any way, shape, and form. At the same time, I know I do a lot of things that are controversial. And those are on me, not on you.

Neal Katyal:

So I think that the question is really important. I think Sherrilyn Ifill's drawing attention to this issue, really important, particularly at this, I think, unique moment in time. I do think the job of any lawyer in both government or in private practice is to give candid advice to your client. I think there's no more sacred calling we have than to do that.

Neal Katyal:

It's different with government lawyering because it's not quite clear who the client is. And I think Paul and I will probably get into that in more detail later. It depends, I think, a bit where you sit. So the solicitor general has a different set of what might be clients than say some of the hypotheticals that you're going to be discussing later today, the lawyer for the town supervisor or the city council or something like that. I do think there are really important differences.

Neal Katyal:

But to me, kind of the most important thing about being a government lawyer, and it's true in private practice, but I think even more so just given at least in the federal government the awesome powers you have, is the obligation to tell your client no, and you can't do that. And I think what sets the government apart a little bit from the private sector is that there are always some people in the government, political

appointees, who want to say yes to the White House, or perhaps the attorney general, whomever, to policy people, even when they know the answer should be no. Even when the answer is obviously no. And conversely, sometimes there's a set of people in government who get power by saying no. They're not relevant unless they become a stumbling block to something that the president or someone wants to do.

Neal Katyal:

So you have both of these dynamics occurring, and that makes it really hard. And to me, the most important thing I learned in two tours, one as a kind of young Justice Department person, 27 years old, in the Deputy Attorney General's Office, and then later in the Solicitor General's Office, is the importance of regularized process. It's going to be hard sometimes substantively to fight against the people who want to say yes or want to say no. And that's why the Justice Department has such rigid procedures before making an important decision. Like Paul and I, when we were in the SG's Office, and it's still the case today, any decision starts with a line recommendation from the line attorney, maybe in the field, the US Attorney's Office goes up to the US attorney. Then goes up to the relevant component of the Justice Department, then goes to line attorney in the Solicitor General's Office, a career person. Then goes to a deputy solicitor general.

Neal Katyal:

And all these people have to write memos and they all have to share them with each other so that they can react to it in, so there's no stove piping, only certain memos get seen by certain people or something. And then it gets teed up to the solicitor general for a decision. And the best thing about being solicitor general, you don't have to write a memo. Everyone else has written a memo. You don't have to. And you get to make the decision. But you do so with a full view of all of the papers before it. And I feel like most of the problems that happened in the Justice Department, we certainly saw it in the last administration, was when you had a kind of short circuiting of the process and you had stove piping going on. And that's a sure way to getting bad substantive decisions.

Paul D. Clement:

Yeah. And Neal, I agree with everything you said, including what a pleasure it is to be here. I can't claim to have a title based on Paul Saunders. But other than that, I echo everything that you say. I think the process really is important. And I do think that sometimes the lawyers can reinforce the process by having in their own minds a very clear distinction between what's the legal question before them and what is the policy question that other people may be trying to conflate matters with. And you're absolutely right about, in the Solicitor General's Office, there's a process that's well understood, generally well respected, where people put their legal analysis in writing and put their names behind it.

Paul D. Clement:

And there is always a temptation for people, particularly people who are just much more interested in the policy issue than the underlying legal issue, to try to short circuit the process. There are lots of different ways to short circuit the process. But one way I'll just highlight is that sometimes there'll be a legal challenge to a policy, and some people who never really liked that policy as a policy matter will essentially try to get the government to not appeal, to drop a legal prosecution or whatever it is, just because they don't like the underlying policy.

Paul D. Clement:

And I think it was very helpful when I was in the office to kind of keep the difference between the legal question and the policy question separate. And on more than one occasion I effectively or literally told somebody that was trying to convince us not to appeal, or not to petition for review of a rule that was struck down, essentially said, "Look, I'm not really hearing a legal argument. If you don't like this underlying rule, here's the address, the physical street address, of the agency that promulgated the rule. If you want to go talk to them and have them take the politically accountable step of withdrawing the rule, I'd be delighted, or at least indifferent. I got plenty of other work to do here."

Paul D. Clement:

But I think part of that process that really plays an important role, is it disciplines people to make legal arguments. In my experience, if they're trying to short circuit the process and really just have a policy or political goal in mind, they don't really want that in writing. They don't want their fingerprints anywhere near it. And I think that process really helps discipline people to put their name to the arguments they're making. And then that helps steer the arguments to the legal arguments that are not just kind of policy disagreements that are masquerading.

Paul D. Clement:

The other thing that I thought you said that's important, and I just want to amplify, is it's very easy to focus on what I think is probably the most noble thing that a government lawyer can do, and that is tell their client, and we get back to the issue of who's the client, but to tell their client no. I mean, I think at an instinctive level, I think it's easier to understand why there's some nobility of a lawyer saying that this is what the law provides. I know you want to do something different, but you just can't do it.

Paul D. Clement:

But I think part of the way, as a government lawyer, you put yourself in a position to be able to say no, and to actually have people listen to that advice, is by also saying yes when appropriate. And I think Neal's point that sometimes, although we focus on saying no as a noble act, I mean, if you're like Mikey in the cereal commercial, and you don't like anything, surely not everything that the government is trying to do is problematic. And if you're going to work in the executive branch of the government, you probably ought to have at least some respect for executive prerogative.

Paul D. Clement:

And so I do think that part of the way that you essentially put yourself in a position to be taken very seriously when you say no is to also say yes under circumstances. Give that same candidate legal advice and say, "Yes, we can do this. I mean, it might have some risks, but we can do this." And then if you have a reputation as somebody who doesn't always say no, then you put yourself in a position, I think, where you can credibly say, "No, this is too far. This is a real line. It's not that I perceive everything as problematic, but this is just a bridge too far."

Neal Katyal:

Yep. Paul, I think that's so wise and thoughtful. And I don't think it's in some ways that different than private practice. My rule is if I say no to a client, I'm going to have a but. And then I say here's how you could do X or Y if I'm giving them advice on something. I think that's all something that all of our audience is well familiar with. And as well, the idea that you really have to say no, as a government attorney, when there's personal motivations behind a certain request, as opposed to government ones. And I think some of the hypotheticals that the folks are going to talk about later today are examples of

that in which the government lawyer is being asked to benefit some government person in their private capacity. And obviously that's been in the news of late.

Neal Katyal:

But what I wanted to ask you, Paul, is I think your process point makes a ton of sense. And it's not that hard to implement when you say to an executive branch official, someone at the White House or whatever, "Hey, go get that agency regulation changed." Because after all, they're in control of the agency, presumably, unless it's an independent one. But what about when it's Congress? So I certainly faced that situation in which there were some laws that the administration was deeply opposed to, and they were under attack. And you can say to the White House, "Hey, just go get it repealed in Congress." And they say, "Yeah, fat chance." And that changes, I think, the dynamic a bit. I wonder what your thoughts are on that?

Paul D. Clement:

Yeah. No, the congressional aspect of it does raise, I think, an additional complication. And one of the things that I think is an important ingredient of our system is separation of powers, at least at the federal level, is that as a general matter, the people that we expect to and affirmatively want to be defending the constitutionality of acts of Congress in court are people from the executive branch and not people from Congress. I mean you could have a different system. You could have a system where the House General Counsel's Office and the Senate Legal Counsel, had dozens of lawyers and were hiring Supreme Court clerks routinely, and were getting to appear in court. And they were the selected entities that defended the constitutionality of acts of Congress, but that's not the system we have.

Paul D. Clement:

We have a system where we understand that part of the executive branch's constitutional duty to take care that the law is faithfully executed includes defending the constitutionality of acts of Congress, and to roughly state the standard, as I've understood it, that's subject to two caveats. One, you have to be able to make good faith or reasonable arguments in defense of statutes. And there's obviously some play in the joints there. And then the second thing is I think administrations across different parties and across different decades at least have always understood it's a little bit different if the act of Congress, if its asserted unconstitutionality is that it intrudes on the constitutional prerogatives of the executive branch, then it makes a little bit more sense for the executive branch lawyers to sort of take the executive branch's side of the dispute.

Paul D. Clement:

But subject to those two caveats, we really do have the presumption that the Justice Department will be in there defending the acts of Congress and their constitutionality. Here too, I think, anytime you're going to have a standard, like reasonable arguments or whatever it is, good faith arguments, there are going to be some debatable cases. There are going to be some hard cases. And here too, I do think sort of in a sense saying yes can help you if you have to say no. I mean in my time period in the office we, I think it's fair to say, defended the constitutionality of a number of acts that were not particularly politically or policy wise popular with the political party of the administration we were working in.

Paul D. Clement:

And so, for example the bipartisan Campaign Finance Reform Act was passed. It wasn't very popular with Republicans on the Hill. But we defended that act, and indeed did so successfully, in the Supreme

Court. On the other hand, in my time there were one or two acts of Congress where we didn't defend the constitutionality of the act of Congress because it was effectively indefensible. I mean one, just example, just to highlight the point during my time, is Congress passed an appropriations rider that said that entities that accepted federal transportation funding could not have pro drug legalization advertisements. But they were perfectly free to have advertisements to say, just say no, keep drugs illegal. And of course, there's a name for that. It's called viewpoint discrimination, and it's almost always unconstitutional. So a judgment was made that we couldn't defend the constitutionality of that.

Paul D. Clement:

And I think giving people an example of where we defend acts of Congress, even if they're not super popular with people in our party, I think was very, very important. And then also giving sort of an example of here's where we're going to give independent and candid advice even to Congress, and even putting a huge thumb on the scale that we'll try to make arguments to defend the constitutionality of acts of Congress. This is just a bridge too far. This is indefensible. And so we can't go into court and defend it.

Neal Katyal:

Yeah, that is also wise. I agree with all of it. I mean, and your campaign finance example really does, I think, starkly highlight the implicit question, which we now I think should make explicit, which is who the client is? Because if the client were the president, and presumably the president at that time was opposed to campaign finance regulation, you'd have to do his bidding and not defend, go into the Supreme Court and either refuse to defend or even come in and say that the law was unconstitutional because that would be your obligation as the lawyer to a client. But as the solicitor general, you also have a second client, which is Congress. And sometimes of course, there's a clash between Congress and the president on a matter of executive power. That's that second category of times when you don't defend something that you mentioned.

Neal Katyal:

But in circumstances like campaign finance, it's not any sort of clash of separation of powers. There's a clash of political views about whether the regulation is good or not. But there isn't a direct conflict in terms of the hierarchy of federal power or anything like that. So you've got two competing possibilities here, or sometimes competing. You've got Congress and the president or the administration as a whole. I'd also add as the solicitor general, and I think that's actually true of all government lawyers, there's a third obligation, which is to the public at large, to the American people.

Neal Katyal:

To me that is expressed most powerfully by the solicitor general's decision to confess error in cases. So this happens about two times a year, and it goes all the way back to, I think, Taft in 1891 when he was solicitor general, in which what happens is that the Justice Department has won case in the Court of Appeals, some criminal case usually. And then the defendant appeals to the Supreme Court, files a petition for certiorari. And the solicitor general looks at it, and says we actually shouldn't have won that case, in say the Sixth Circuit or whatever. I actually think the defendant was right.

Neal Katyal:

And the solicitor general then files a piece of paper in the Supreme Court saying, "Hey, Supreme Court grant certiorari in this case and rule for the defendant." That's a remarkable thing for a lawyer to do.

Obviously there's no private practice analogue. AIG isn't going to hire me, and then I'll win a case with them in the Sixth Circuit, and then go to the Supreme Court and say, "Actually AIG should have lost, Supreme Court. Grant certiorari. Rule against us."

Neal Katyal:

But that does happen in the Supreme Court. And it's so powerful because literally the government lawyer, the solicitor general, will sit on the same side as the defendant in the courtroom, and stand up and argue for the defendant. And then the court has to appoint an amicus curiae to argue what the government would've argued. And for me, at least, when I was running the office, my biggest nightmare was that I would confess error in a case, say that there's no reasonable argument basically for the government to have made in defending this conviction, and then to have the amicus curiae come up with some brilliant reason why the Court of Appeals decision was correct. Fortunately, that never happened. But I think as we think about the obligations of government lawyers, there is I think no finer example of this kind of third obligation, your client being not just the president or Congress, but the American people. I don't know, Paul, if you have thought on this.

Paul D. Clement:

No, I agree a 100%. And I think you've put your finger on it. It's both a great example. It's never something I think anybody in the Solicitor General's Office recommends lightly. It doesn't make you very popular with either your colleagues that procured the prosecution, or worse still, the Court of Appeals judges who accepted the government's argument below. For you to turn around and say that their decision is not just wrong, but essentially indefensible is not a step you take lightly. But virtually every solicitor general since Taft has done it. And the reason is because there are some cases where you're just staring an unjust result in the face.

Paul D. Clement:

I mean there's a prudential aspect to it as well. You recognize that it would not go well for you in the Supreme Court, but it's not just that kind of instrumentalist view of it. It really is the office saying this result can't be squared with the constitution, or with the only statute that authorizes it, or whatever it is in the particular case. And I think you're right to highlight it because it surely is in the interest of the executive branch at some level to defend a prosecution that they've spent time procuring. And yet a decision is made that, no, that either because the executive as a whole has ultimately made its determination that the action is improper and should be discontinued, or because you think of it as being this broadening of the client to take into account the full interests of the United States, including the people who are governed, who obviously have a liberty interest in not being prosecuted unfairly. There are different ways to look at it, but it really does highlight that this question of kind of who's the client is complicated, and it's not just two dimensional.

Paul D. Clement:

And let me just add another part of that I think is worth highlighting. Because as you say correctly, there's no private law analog to this. And part of the reason that there's no private law analogue to this is that if you told AIG that, "Hey, I've successfully procured this favorable result in the Sixth Circuit, but I just don't think it's defensible in the Supreme Court," I mean after the client figured out that you actually weren't pulling their leg and you were serious, the next thing they do is say, "Well Neal, thanks for getting us this far. Do you have Paul Clement's number? I'm going to call him and see if he couldn't represent us in the Supreme Court."

Neal Katyal:

That happens to me all the time anyway.

Paul D. Clement:

And if it weren't my number, it'd be somebody else's number. But the point is that a client's going to get other lawyers to take their position up in the Supreme Court. And in the Solicitor General's Office in particular. But I think through a lot of government organizations, by statute, by tradition, it's the in-house lawyers who are the ones that represent the government. And it's not an easy matter for the government to simply get somebody else to take on the representation. We have both the responsibility, the luxury, and I suppose a little bit of the power, of being the monopoly supplier of legal services to the executive branch. And I think, and this gets to the heart of why this convocation is so important and why these questions are hard, is because I think that aspect of the representation makes it impossible to just quickly and easily translate all the professional responsibility rules that govern in the private sector over to the public sector and government lawyers.

Paul D. Clement:

And just to give an example, and Neal I know you dealt with similar situations, I think I've heard you talk about them. So I'll introduce this, and then let you sort of take it from there. But it happened probably half a dozen times during my tenure as solicitor general, that the Supreme Court would grant certiorari in a case involving one of the anti-discrimination and employment statutes. Could be Title VII. Could be Americans with Disabilities Act, whatever the statute. And it was a case that the government previously hadn't participated in, and the court would either call for our views, or nonetheless, they wouldn't call for our views, they'd grant cert, but they kind of expected us to participate in the case.

Paul D. Clement:

And two very predictable things then happened after the court granted review. One is the lawyers for the Civil Division at main Justice wrote a memo that said, "Okay, the Court is going to decide this important question about the reach of a federal anti-discrimination and employment statute. That statute applies to the federal government as employer. We in the civil division represent the United States as employer defendant in all of these actions. So it's in the interest of the United States that we support the defendants in this case."

Paul D. Clement:

So far so good, but it was equally predictable that I get a memo from the Civil Rights Division. And the Civil Rights Division would point out that that same statute applies specifically to certain public, state, and local governments. And as to its application to those state and local governments, the Civil Rights Division of the Justice Department is the principle enforcer of the rights of the employee. And so there's an obvious interest of the United States in the Supreme Court's resolution of this statutory issue. And the interest of the United States is squarely in supporting the employees.

Paul D. Clement:

Now, the tricky thing is that the solicitor general represents the Civil Division and Civil Rights Division, and yet they have diametrically opposite positions. My understanding is if you confront that kind of dynamic in the private sector, you certainly can't represent both clients. And probably by the time

you're done getting all the professional responsibility advice you need, you can't represent either of them. You have two clients you're currently representing with diametrically opposed views.

Paul D. Clement:

But in the Solicitor General's Office, that's not the way you resolve the dispute. That's not the way you'd resolve any conflicts question. And you actually work through the issue and try to fashion the position of the United States. Sometimes you decide with the Civil Division, sometimes you decide with the Civil Rights division. Sometimes you come up with some clever compromise where you try to have your cake and eat it too. But all of that is I think something that illustrates that, at least in the Solicitor General's Office, but I think more broadly, the question of who the client is, is very complicated and simply applying all the normal rules from the private sector don't quite work.

Neal Katyal:

Yeah. So important, Paul, all you said. Before getting into that whole example and so on, just on confessions of error, you said it was unpopular for Court of Appeals judges when there's a confession of error by the solicitor general. The best example of that, and I know we're in New York, so the legendary Learned Hand actually said something like, "It's bad enough to be reversed by the Supreme Court, but I'll be damned if I'm going to be reversed by some solicitor general."

Neal Katyal:

So on this question of kind of dual components or multiple perspectives housed within the federal government, I do think that's why the process point that we were talking about earlier is so important. Because if you've got a process where the Civil Division can say, "Hey side with the employer in this discrimination case," and a memo from the Civil Rights Division saying the contrary, and they can see each other's memos and respond to one another and hash it all out as the solicitor general will in an hour long or maybe longer meeting or set of meetings before formulating a position, it's going to be a better position than if the favored branch at a given time, the Civil Division in some administrations, or with some cases, Civil Rights in others, can have the ear of the solicitor general. That's the worst way to get a decision.

Neal Katyal:

And so when people ask, "Why is the solicitor general taken so seriously by the Supreme Court," I do think a key part of it is following this process. Because if you follow the process, the brief reflects the multiple different perspectives that mirror American society much more easily than if it's just a kind of one note pro civil rights all the time, solicitor general, or anti-civil rights, something like that.

Neal Katyal:

To me, that raises another question. We've been talking about the duty to defend and things like that. But there's also a kind of duty of candor to the court that I think is true for government lawyers. I mean, all lawyers, again, have a duty of candor. But I do think there's a special responsibility when you're a government lawyer. And to uncover, for example, the warts in a case. I think when you're a private lawyer, you might shade it a little bit more toward the zealous advocacy side than as a government lawyer.

Neal Katyal:

That's particularly true, it seems to me, when you have information in the government that the other side doesn't have. Facts, data, particularly inside national security cases, in which some of the information is classified. So when the solicitor general goes in and says there's a serious national security need for X or Y, it's almost impossible for a private attorney to really have that actual information, the sources and methods and whatever that underlies that decision, to question it.

Neal Katyal:

And so, as a result, I know you did this and certainly I tried to as well when I had national security cases, real kind of special obligation to bend backwards and make sure that the information you're giving the court is so straight and on the up and up. That hasn't always happened with solicitors general in the past, most predominantly in the Japanese American internment. But I think that's also part of the duty of ethics of a government lawyer. I don't know if you have any particular thoughts on that, but I would just throw that there.

Paul D. Clement:

No, and I think it goes full circle to what we were talking about at the very beginning about sort of independent and candid advice. I mean in terms of the solicitor general's relationship with the court and the relationship of government lawyers generally to courts, I mean you can't be completely independent of your client. I mean there are difficult questions about who the client is, but once you have the client, you're expected to represent the client. But I think that your duty of candor to the court is amplified because your client is, at some level, a sovereign entity. Obviously we all have a duty of candor to the courts, so that applies to every lawyer.

Paul D. Clement:

But I agree with you that I think it's heightened for those who are representing sovereign entities. And I think, again, as with most things, you can look at it from a slightly more practical standpoint, and say you have a duty of candor that's heightened, and you also would be well advised to sort of honor that duty because you're much more likely to be a repeat player before the court. Because mistakes will happen. It's impossible with an entity as large as the federal government for you as the lawyer to know everything that everybody in the federal government knows about something. You couldn't. It's impossible.

Paul D. Clement:

But if you do your absolute best to convey that, and you get it right 99 times out of 100, then you're not going to lose your credibility if an inevitable mistake is made. But you got to know that you're going to be up there in other cases. And so you always have to put the duty of candor first to preserve kind of the overall relationship. So I think you can look at it in just more practical terms, but I also think it's more than that. It's that you are representing the sovereignty of the entity that you're representing. It's clearest in the United States, but I think it's true, I've been privileged to represent state governments or Native American tribes in private practice. And I think representing those clients too, you have this special responsibility because you are allowed to invoke doctrines that nobody else is allowed to invoke. And you get sovereign immunity. But with that, I think comes some added responsibility to make sure that you are faithfully and candidly representing the branch of government that you represent, or the sovereign entity you represent.

Paul D. Clement:

So I think those things are very important. I'm conscious we're getting low on time. I just want to throw out one sort of, it's all well and good to sort of explore all the things that are hard or all the difficult issues. Just I'd offer, sort of based on my own experience, one piece of practical advice. And I'm sure, Neal, that maybe you have some additional advice or better advice, frankly. But one thing, representing government entities, it's not as easy and straightforward, I think, as representing private clients in some respect. Sometimes there are divisions of labor within the executive branch or within the government. And so there are other people that people are listening to. And sometimes you do have to give tough advice. You have to give that “no” advice.

Paul D. Clement:

And in the Solicitor General's Office in particular, we were given a fair amount of kind of leeway and independence to make judgements about which cases to appeal and which cases not to appeal. I mean, we could have a whole other discussion about the relationship between the SG's Office and the White House Counsel's Office, or between the SG's Office and the Attorney General's Office. But I think with this responsibility, sometimes you can do yourself a great deal of sort of a favor by giving good candid advice, but also keeping lines of communication open with your client. I mean, I think in my own experience, we were allowed to say no, and we were allowed a greater degree of independence because we didn't put ourselves in positions where we were going to take an unpopular position and people in the White House were going to read about it the next day in the papers and not be prepared for it.

Paul D. Clement:

And so in my case, I think by keeping the lines of communication open with either your client or your client's other lawyers, and not asking for permission, but simply saying, in the appropriate circumstances, this is what we're going to do. I just want you to know that this is what we're going to do. And you might read a news article that suggests that we've just abandoned some policy, and we haven't done anything of the sort. But here's what we've done. And in my experience, if you can sort of prepare people for that, you can protect both the independence of your legal advice and your ability to say no.

Catherine O’Hagan Wolfe:

I'm going to jump in for a moment. Neal, do you have something to respond to Paul? Because it's just about time to wrap up.

Neal Katyal:

Yeah. If you wouldn't mind, just a minute. I think the best non-obvious advice I got before going to the Solicitor General's Office was exactly that. That actually the way to preserve your independence is by having regular open communications with the other players. The other thing I'd say, just in terms of concrete practicality, is the role of career lawyers. Because when you come in as a political appointee, you do have people who are trying to bend your ear on X and Y. And in the Solicitor General's Office, and I know it's true in a lot of state governments, you have longstanding career lawyers who've seen everything from both sides of administrations and the like. And often they can be really helpful in kind of steering your conscience and getting to the right result. And time and again, that's what I did in the office, and I think that's true throughout the 50 states.

Paul C. Saunders:

Thank you very much. Thank you both very much.

Neal Katyal:

Thank you.